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Monticello Nuclear Generating Plant
2807 W County Road 75
Monticello, MN 55362

June 18, 2010

L-MT-10-039
10 CFR 50.73

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Monticello Nuclear Generating Plant
Docket No. 50-263
Renewed License No. DPR-22

LER 2010-001, "Missed Safety Relief Valve Lift Test Surveillance Interval"

The Licensee Event Report (LER) for this occurrence is attached.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

Timothy J. O'Connor
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power - Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC

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Telephone: 763-295-5151 • Fax: 763-295-1454

NRC FORM 366 (9-2007)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 31500104	EXPIRES 8-31-2010

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Monticello Nuclear Generating Plant	05000263	1 of 3

TITLE (4) Missed Safety ReliefValve Lift Test Surveillance Interval

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER 05000
04	20	2010	2010	– 001	– 00	06	18	2010	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	1
POWER LEVEL (10)	100%

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §:(Check all that apply) (11)

	20.2201(b)		20.2203(a)(3)(ii)		50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)
	20.2201(d)		20.2203(a)(4)		50.73(a)(2)(iii)		50.73(a)(2)(x)
	20.2203(a)(1)		50.36(c)(1)(i)(A)		50.73(a)(2)(iv)(A)		73.71(a)(4)
	20.2203(a)(2)(i)		50.36(c)(1)(ii)(A)		50.73(a)(2)(v)(A)		73.71(a)(5)
	20.2203(a)(2)(ii)		50.36(c)(2)		50.73(a)(2)(v)(B)		OTHER Specify in Abstract below or in NRC Form 366A
	20.2203(a)(2)(iii)		50.46(a)(3)(ii)		50.73(a)(2)(v)(C)		
	20.2203(a)(2)(iv)		50.73(a)(2)(i)(A)		50.73(a)(2)(v)(D)		
	20.2203(a)(2)(v)	X	50.73(a)(2)(i)(B)		50.73(a)(2)(vii)		
	20.2203(a)(2)(vi)		50.73(a)(2)(i)(C)		50.73(a)(2)(viii)(A)		
	20.2203(a)(3)(i)		50.73(a)(2)(ii)(A)		50.73(a)(2)(viii)(B)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Ron Baumer	763-295-1357

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

ABSTRACT

While performing a review of operating experience station personnel identified that the plant may have exceeded the American Society of Mechanical Engineers (ASME) Code required testing interval for five of eight of the Safety Relief Valves (SRVs) [RV]. The apparent noncompliance with the ASME Code was validated by the engineering staff on 4/20/2010 and the Shift Manager subsequently declared a missed surveillance and entered SR 3.0.3. A risk assessment was performed as required by SR 3.0.3, which determined that the risk significance was minimal.

The cause of the event was an interpretation of the test interval requirements that resulted in the plant utilizing an install to test interval vice a test to test interval for new and refurbished valves.

Corrective actions taken or planned are: a one-time relief request to go beyond the 5 year testing interval has been submitted, revise the Corporate Directive regarding the testing of SRVs and to develop guidance regarding the process to use and evaluate code interpretations.

TEXT *(If more space is required, use additional copies of NRC Form 366A)* **(17)**

Event Description

While performing a review of operating experience station personnel identified that the plant may have exceeded the American Society of Mechanical Engineers (ASME) Code required testing interval for five of eight of the Safety Relief Valves (SRVs) [RV]. The apparent noncompliance with the ASME Code was validated by the engineering staff on 4/20/2010 and the Shift Manager subsequently declared a missed surveillance and entered SR 3.0.3. A risk assessment was performed as required by SR 3.0.3, which determined that the risk significance was minimal.

Upon review of the SRV test history, it was determined that five of eight SRVs had exceeded the allowable five year test interval based on a test to test interval. Up to this point, the station had based their testing interval on an installation to test interval, which did not count the time a refurbished valve was stored in a warehouse prior to installation. In March 2005, a Corporate Directive had been revised to document how the station would address ASME OM Code interpretation 01-18, related to SRV test intervals. The directive provided a distinction between new and refurbished valves and any valves which were in-service. A brand new valve or a refurbished valve was not considered an in-service component and therefore was not subject to the requirements of the ASME code until it was installed.

Event Analysis

The event is reportable to the NRC under 10 CFR 50.73(a)(2)(i)(B) – Operation or Condition Prohibited by Technical Specifications. There was no required 50.72 notification for this event; however a Licensee Event Report is required.

Safety Significance

There were no nuclear, radiological or industrial safety significant consequences related to this event.

The Monticello risk assessment group reviewed the event for risk impact. The failure probabilities for the five SRVs were adjusted to correspond to a ten year test interval. The Monticello PRA model was then re-quantified to determine the impact on the Core Damage Frequency (CDF) and the Large Early Release Frequency (LERF). The method of calculation contained the following conservative assumptions:

- Although the surveillance test is designed to test only the setpoint of the SRVs, this risk assessment conservatively elevated all possible SRV failures that could lead to failure