50-263 MONTICELLO

LICENSE AMDT REQUEST RE INSERVICE TESTING AND DELETION OF REDUNDANT SURVEILLANCE

REC'D W/LTR DTD 12/13/90...9012180097

Exhibit A

Monticello Nuclear Generating Plant

License Amendment Request dated December 13, 1990

Evaluation of Proposed Changes to the Technical Specifications
for Operating License DPR-22

Pursuant to 10 CFR Part 50, Section 50.59 and 50.90, the holders of Operating License DPR-22 hereby propose the following changes:

1. Inservice Testing

Proposed Changes

a) Add Specification 3.15.B/4.15.B, Inservice Testing, as shown in Exhibit B page 229ff.

b) Reference inservice testing specification, 4.15.B in the following surveillances: 4.5.A.1; 4.5.B.1; 4.5.C.1; 4.5.D.1; 4.5.F.1; 4.7.D.1.c; and 4.7.D.3, as shown in Exhibit B, pages 101, 102, 104, 106, 108, 111, 170, and 171.

c) Change allowable out of service times to the Standard Technical Specification allowable out of service times in the following specifications: 3.5.A.2; 3.5.A.3; 3.5.B.2; 3.5.B.3; 3.5.B.4; 3.5.C.3; 3.5.D.2; 3.5.E.2; 3.5.E.3; and 3.5.F.2, as shown in Exhibit B, pages 102, 103, 104, 105, 108, 110, and 111a.

d) Update the bases as appropriate, as shown in Exhibit B pages 116, 117, 120 and 229g.

Reason for Changes

These changes are proposed because frequent testing of equipment can have a negative effect on the equipment by increasing the number of cycles the equipment experiences.

Standard Technical Specifications (STS) require less frequent testing.

Comparison of Monticello Technical Specification Surveillance Requirements to Standard Technical Specification Surveillance Requirements is as follows:

Equipment	Existing Monticello Surveillance Requirement/ Location	STS Surveillance Requirement/ Location	Proposed Monticello Surveillance Requirement
Core Spray	4.5.A.1	4.5.1.b	per ASME
pumps	monthly	per ASME code	code
valves	monthly		
LPCI	4.5.B.1	4.5.1.b	per ASME
pumps	monthly	per ASME code	code
valves	monthly		
RHRSW	4.5.C.1		per ASME
pumps	every 3 months		code
valves	every 3 months		
HPCI	4.5.D.1	4.5.1.b	per ASME
pumps	monthly	per ASME code	code
valves	monthly		
RCIC	4.5.F.1	4.7.4.b	per ASME
pumps	monthly	per ASME code	code
valves	monthly		
Primary Containment	4.7.D.1.c	4.6.3.3	per ASME
Automatic Isolation	quarterly	per ASME code	code
Valves	4.7.D.3	4.6.3.1	PMT per
	post maintenance	post maintenance	ASME code

Monticello surveillance requirement 4.7.D.3 is also covered under the ASME Code section for post maintenance testing, thus making this surveillance requirement a redundant requirement and should be deleted.

Standard Technical Specification allowable out of services times for the above specifications are requested at this time, since surveillance test frequencies and allowable out of service times are interrelated in reliability studies.

System	Existing Monticello Out of Service Time	STS Out of Service Time	Proposed Monticello Out of Service Time
Core Spray	15 days 7 days	7 days 72 hours	7 days 72 hours
LPCI 1 pump 2 pumps	30 days 7 days	7 days 72 hours	30 days 7 days
LPCI 1 valve 2 valves	30 days 7 days	7 days 72 hours	7 days 72 hours
Drywell Spray	30 days	7 days	7 days
RHRSW pumps systems	30 days 7 days	7 days 72 hours	30 days 7 days
HPCI	7 days	14 days	14 days
ADS 1 valve 2 valves	7 days 24 hours	14 days 12 hours	14 days 12 hours
RCIC	15 days	14 days	14 days

Monticello incorporated the Standard Technical Specification Out of Service times for all systems except the RHR pumps (LPCI) and RHRSW systems. Monticello has 2 sets of 2 pumps and a cross-connect valve that divides the 2 systems. Monticello operates with the cross-connect valve open. Therefore, if one pump is out of service, there remains three available pumps. A longer out of service time should be allowable, for one pump out of service with three pumps remaining, then for one pump out of service with one pump remaining.

Monticello would like to retain the 7 day allowable out-of-service time for the RHRSW system. This is consistent with the proposed BWROG RHRSW Standard Technical Specification.

Since the proposed surveillance frequencies and allowable out of service times are consistent with the surveillance frequencies and allowable out of service times in Standard Technical Specifications, these changes conform to NRC policy.

Determination of Significant Hazards Considerations

The proposed changes to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

   These changes will improve the performance of equipment by reducing the potential for equipment failures due to unnecessary testing. Therefore, these changes will not effect the probability or consequences of previously analyzed accidents.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

   These changes only affect the equipment testing frequency, and therefore, will not create a new or different kind of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

   These changes will improve the performance of equipment and are intended to reduce the potential for equipment failures due to unnecessary testing. No safety margins are affected.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Monticello Operating License proposed in this amendment request are similar to NRC example (i). Example (i) applies in this case since the proposed change is administrative in nature and does not carry any operational significance or hazards.

Therefore, based on the above considerations, we have concluded that these changes do not involve a significant hazards consideration.

2. Removal of Redundant Equipment Surveillance

Proposed Changes

a) Remove the requirement to test redundant equipment in the following sections: 4.4.B; 4.5.A.2; 4.5.A.3; 4.5.B.2; 3.5.B.3; 4.5.B.3; 4.5.C.2; 3.5.C.3; 4.5.C.3; 4.5.D.2; 4.5.E.2; 4.5.F.2; 4.5.G.2; 3.7.B.1.a; 4.7.B.1.a; 4.7.B.1.b; 3.13.B.2; and 4.13.B.2, as shown in Exhibit B, pages 94, 102, 103, 104, 105, 106, 107, 108, 110, 111a, 112, 166, 167, 225, and 226.

b) Update the associated bases, as shown in Exhibit, B pages 99, 100, 116, 117, 118, 119, 120, 204, and 228b.

Reason for Change

The testing of redundant equipment, to prove operability, can have a negative effect on the equipment by increasing the number of cycles the equipment experiences. The Standard Technical Specifications (STS) do not require testing of the redundant equipment in similar situations.

Comparison of Monticello Technical Specification Surveillance Requirements to Standard Technical Specification Surveillance Requirements is as follows:

Equipment	Existing Monticello Surveillance Requirement/ Location	STS Surveillance Requirement/ Location	Proposed Monticello Surveillance Requirement from Item 1
Standby Liquid Control pumps	4.4.A.1 monthly	4.1.5.b 31 days	unchanged
Core Spray pumps valves	4.5.A.1 monthly monthly	4.5.1.b per ASME code	per ASME code
LPCI pumps valves	4.5.B.1 monthly monthly	4.5.1.b per ASME code	per ASME code
RHRSW pumps valves	4.5.C.1 every 3 months every 3 months		per ASME code
HPCI pumps valves	4.5.D.1 monthly monthly	4.5.1.b per ASME code	per ASME code

Equipment	Existing Monticello Surveillance Requirement/ Location	STS Surveillance Requirement/ Location	Proposed Monticello Surveillance Requirement from Item 1
ADS valves	4.5.E.1 operating cycle	4.5.1.d 18 months	unchanged
RCIC pumps valves	4.5.F.1 monthly monthly	4.7.4.b per ASME code	per ASME code
Standby Gas Treatment System	4.7.B.1 monthly	4.6.5.3.a 31 days	unchanged
Primary Containment Automatic Isolation Valves	4.7.D.1.c quarterly 4.7.D.3	4.6.3.3 per ASME code 4.6.3.1	per ASME code deleted
Fire Protection pumps			
Motor driven	4.13.B. monthly	4.7.7.1.1.b 31 days	unchanged
Diesel driven	4.13.B. monthly	4.7.7.1.2.a 31 days	unchanged

The NRC approved similar changes to the Prairie Island Technical Specifications on October 27, 1989.

Since the surveillance frequencies in the Monticello Technical Specifications and the proposed surveillance frequencies in Exhibit A, Item 1 are consistent with the surveillance frequencies in the Standard Technical Specifications, these changes conform to NRC policy.

Determination of Significant Hazards Considerations

The proposed changes to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

   These changes will improve the performance of equipment and is intended to reduce the potential for equipment failures due to unnecessary testing to prove operability. Periodic testing, required by Section 4 of the Technical Specifications, performs the same function. Therefore, these changes will not effect the probability or consequences of previously analyzed accidents.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

   These changes only affect the testing of equipment to verify operability, and therefore, will not create a new or different kind of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

   These changes will improve the performance of equipment and are intended to reduce the potential for equipment failures due to unnecessary testing to prove operability. No safety margins are affected.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Monticello Operating License proposed in this amendment request are similar to NRC example (i). Example (i) applies in this case since the proposed change is administrative in nature and does not carry any operational significance or hazards.

Therefore, based on the above considerations, we have concluded that these changes do not involve a significant hazards consideration.

3. Removal of Redundant Auxiliary Electrical System Testing

Proposed Changes

a) Add "The operability of the other emergency diesel generator need not be demonstrated if the emergency diesel generator inoperability is due to preplanned preventative maintenance or testing", as shown in Exhibit B, page 201.

b) Change "seven" to "7" in Specification 3.9.B.3.a as shown in Exhibit B, page 201.

c) Change "immediately and daily thereafter." to "within 24 hours. This test is required to be completed regardless of when the inoperable emergency diesel generator is restored to operability." in Specification 4.9.B.3.a as shown in Exhibit B, page 201.

d) Change "started and loaded" to "started, loaded and operated at approximately rated load for at least 60 minutes" as shown in Exhibit B, page 201.

e) Delete "The test shall continue until both the diesel engine and the generator are at equilibrium conditions of temperature while full load output is maintained." as shown in Exhibit B, page 201.

Reason for Changes

These changes are proposed because the daily testing of the redundant emergency diesel generator, to prove operability, can have a negative effect on the emergency diesel generator by increasing the number of cycles the emergency diesel generator experiences. Generic Letter 84-15 recommended that reducing the number of cold fast starts of the emergency diesel generator generators.

The Standard Technical Specifications (STS) do not require daily testing of the redundant emergency diesel generator in similar situations. Standard Technical Specifications only require the redundant emergency diesel generator to be started within 24 hours.

The proposed changes are consistent with Standard Technical Specifications, and incorporate the recommendations of Generic Letter 84-15. Furthermore, the NRC approved similar changes to the Prairie Island Technical Specifications on October 27, 1989. Therefore, these changes conform to NRC policy.

Determination of Significant Hazards Considerations

The proposed changes to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

   A single emergency diesel generator start demonstrates operability of the redundant emergency diesel generator. Other off-site power sources exist. Deleting the requirement to start the redundant emergency diesel generator daily will improve the performance of the emergency diesel generator and is intended to reduce the potential for emergency diesel generator failure due to unnecessary testing to prove operability. Therefore, these changes will not effect the probability or consequences of previously analyzed accidents.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

   These changes only affect the testing of emergency diesel generator generators to verify operability, and therefore, will not create a new or different kind of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

These changes will improve the performance of the emergency diesel generator generators and are intended to reduce the potential for emergency diesel generator failures due to unnecessary testing to prove operability. No safety margins are affected.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Monticello Operating License proposed in this amendment request are similar to NRC example (i). Example (i) applies in this case since the proposed change is administrative in nature and does not carry any operational significance or hazards.

Therefore, based on the above considerations, we have concluded that these changes do not involve a significant hazards consideration.

4. Changes to Minimum Core and Containment Cooling System Availability

Proposed Changes

Delete Specifications 3.5.G.1 and 3.5.G.2 and renumber Specifications "3.5.G.3" and "3.5.G.4" to "3.5.G.1" and "3.5.G.2", respectively as shown in Exhibit, pages ii, 112 and 113.

Reason for Changes

Specifications 3.5.G.1 and 3.5.G.2 predate the current definition of operable as defined in Section 1 of the Monticello Technical Specifications. Therefore, Specifications 3.5.G.1 and 3.5.G.2 are redundant and can be deleted.

Specification 3.5.G.1 specifies the requirements for the Core and Containment Cooling Systems when one Emergency Diesel Generator is inoperable. It requires all low pressure core cooling and containment cooling subsystems connected to the operable Emergency Diesel Generator to be operable. This is redundant to the requirements of the definition of operability.

Section 3.5.G.1 remains unchanged from the original Technical Specifications issued to Northern States Power. At that time, the definition of operable stated:

> A system or component shall be considered operable when it is capable of performing its intended function in its required manner.

The current definition of operable states:

> . . . When a system, subsystem, train, component or device is determined to be inoperable soley because its emergency power source is inoperable, or soley because its normal power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation provided: (1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), train(s), component(s) and device(s) are Operable, or likewise satisfy the requirements of this paragraph.

For example, consider the possibility of the Division I Emergency Diesel Generator being inoperable. Section 3.5.G.1 requires all Division II low pressure core cooling and containment cooling systems to be operable. In order to consider the Division I equipment supplied by the Division I Emergency Diesel Generator operable, the definition of operability requires operability of the Division II redundant equipment. The two Technical Specification sections make identical requirements. Therefore, Section 3.5.G.1. can be deleted.

Specification 3.5.G.2 requires that inoperable components in the core and containment cooling systems do not defeat the capability of the core and containment cooling systems to fulfill their functions. This is redundant to the requirements of the definition of operability.

Section 3.5.G.2 states:

> Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining operable components to fulfill the core and containment cooling functions.

This section also predates the current definition of operable. The current definition states:

> . . . Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s). . . .

If a combination of inoperable equipment would defeat the capability of a component to fulfill its function, the component would be inoperable per the definition of operable. Therefore, the Section 3.5.G.2 is redundant to the definition of operable and can be deleted.

Determination of Significant Hazards Considerations

The proposed changes to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

   These specifications are obsolete, since the definition of operability performs the same function. Therefore these changes are purely administrative in nature. Furthermore, these changes will not effect the probability or consequences of previously analyzed accidents.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

   These changes are purely administrative in nature, and therefore, will not create a new or different kind of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

   These changes are purely administrative in nature. No safety margins are affected.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Monticello Operating License proposed in this amendment request are similar to NRC example (i). Example (i) applies in this case since the proposed change is administrative in nature and does not carry any operational significance or hazards.

Therefore, based on the above considerations, we have concluded that these changes do not involve a significant hazards consideration.

5. Administrative Changes to Standby Liquid Control

Proposed Changes

a) Change i) "normal" to "system"; ii) add "1."; iii) "3.4.B" to "3.4.A.2"; and iv) "3.4.C.1" to "3.4.B.1" as shown in Exhibit B, page 93.

b) Change "B. Operation with Inoperable Components" to "2" as shown in Exhibit B, page 94.

c) Replace "Specification 3.4.A shall be considered fulfilled, provided that: 1. The component is returned to an operable condition within 7 days." with "operation is permissible only during the following 7 days provided the redundant component is operable." as shown in Exhibit B, page 94.

d) Change "C. Boron Solution Requirements" to "B. Boron Solution Requirements" as shown in Exhibit B, page 95.

e) Change i) "D." to "E." and ii) "C" to "B" as shown in Exhibit B, page 96.

f) Update the associated bases, as shown in Exhibit B, pages 99 and 100.

g) Update the Table of Contents, as shown in Exhibit B, page ii.

Reason for Changes

These changes are due to incorporation of Specification 3.4.B into Specification 3.4.A and subsequent specification renumbering.

Determination of Significant Hazards Considerations

The proposed changes to the Operating License has been evaluated to determine whether it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

   These changes are purely administrative in nature. Therefore, these changes will not effect the probability or consequences of previously analyzed accidents.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

   These changes are purely administrative in nature, and therefore, will not create a new or different kind of accident.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

   These changes are purely administrative in nature. No safety margins are affected.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Monticello Operating License proposed in this amendment request are similar to NRC example (i). Example (i) applies in this case since the proposed change is administrative in nature and does not carry any operational significance or hazards.

Therefore, based on the above considerations, we have concluded that these changes do not involve a significant hazards consideration.

Environmental Assessment

This license amendment request does nor change effluent types or total effluent amounts nor dies in involve an increase in power level. The changes are administrative in nature. Therefore, this amendment will not result in any significant environmental impact.