

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

REQUEST FOR AMENDMENT TO
OPERATING LICENSE NO. DPR-22

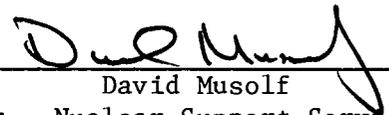
Revision No. 1 to License Amendment Request Dated April 3, 1984

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Technical Specifications as shown on the attachments labeled Exhibit A and Exhibit B. Exhibit A describes the proposed changes along with reasons for the change. Exhibit B is a set of Technical Specification pages incorporating the proposed changes. Exhibit C and D are revised control room habitability analyses supporting the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

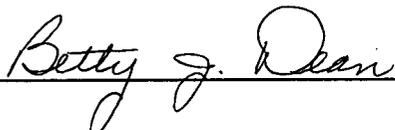
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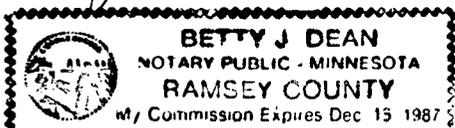


David Musolf

Manager - Nuclear Support Services

On this 17th day of August, 1984 before me a notary public in and for said County, personally appeared David Musolf, Manager - Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.





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EXHIBIT A

Monticello Nuclear Generating Plant

Revision No. 1 to
License Amendment Request Dated April 3, 1984

Proposed Changes to the Technical Specifications
Appendix A of Operating License DPR-22

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

1. CONTROL ROOM HABITABILITY

Proposed Changes

Add limiting conditions for operation and surveillance requirements for control room habitability as shown in Exhibit B.

Reason for Change

This implements the requirements of NUREG-0737, Item II.D.3.4. Revision have been made to our April 3, 1984 submittal as discussed below:

Toxic Gas Monitors

On January 30, 1981 Northern States Power Company submitted for NRC review a control room habitability analysis. Instrumentation for detection of four chemicals (chlorine, hydrochloric acid, ammonia, and hydrogen sulfide) was proposed in this analysis. Since this analysis was performed, new methodology for the estimation of incapacitation times following exposure to toxic gases based on NUREG/CR-1741 has become available. Exhibit C is a supplement to the original January 30, 1984 analysis which employes this methodology. As noted in Exhibit C, only chlorine monitors are required.

Toxic gas monitors have been installed at Monticello for the four gases described above. These monitors have proven unreliable and disruptive to the control room operators even though we believe they represent the state-of-the art in this type of equipment. Following NRC review and approval of the supplemental analysis in Exhibit C and the issuance of Technical Specification changes proposed here, we will remove the hydrochloric acid, ammonia, and hydrogen sulfide monitors and eliminate this unnecessary maintenance burden and distraction to operators.

Charcoal Adsorber and HEPA Filter Testing

Our original April 3, 1984 License Amendment Request proposed Technical Specifications for control room emergency filtration system charcoal adsorber and HEPA filters which were found to be inconsistent with the requirements of Regulatory Guide 1.52. This was discussed during a telephone conference call with members of the NRC Staff. We provided our commitment to revise our submittal to be consistent with this Regulatory Guide.

In the original January 30, 1981 control room habitability analysis, credit was taken for 95% standby gas treatment system adsorption and filtration efficiency and 99% control room emergency filtration system adsorption and filtration efficiency. Exhibit D contains a revision to this analysis with revised efficiencies for these systems as follows:

- Standby gas treatment system efficiency has been reduced to 90% to be consistent with the original NRC Staff Safety Evaluation Report issued for the Monticello Full Term Operating License. Existing Technical Specification requirements are based on 90% credit for this system. Even though the system is expected to perform at much higher efficiencies, the control room habitability radiological evaluation was revised to conform to the original licensing basis. It should be noted that the control room radiation levels are primarily governed by bypass leakage sources and are relatively insensitive to this assumption.
- Control room emergency filtration system efficiency has been reduced to 90%. Based on new modeling methodologies which give credit for plateout, acceptable whole body and thyroid doses can be demonstrated with this reduced efficiency.

As noted in Exhibit D, credit for 90% efficiency is sufficient to show acceptable control room post-accident doses. Therefore, Regulatory Guide 1.52 charcoal adsorber and HEPA filter surveillance acceptance parameters for the 90% efficiency level have been incorporated into the proposed changes. Although the control room emergency filtration system was designed for a substantially higher efficiency, and indeed is expected to perform at significantly better than 90% efficiency, the surveillance test parameters for 90% have been selected to be consistent with existing standby gas treatment system surveillance parameters. This permits existing test equipment and procedures to be utilized, reduces the need to unnecessarily declare a filtration system component inoperable, and eliminates the need to unnecessarily replace charcoal or HEPA filters.

Other Considerations

The proposed setpoint for the radiation monitor is consistent with the requirements of 10 CFR Part 20, Section 20.105(b)(i).

The Limiting Conditions for Operation and Surveillance Requirements proposed in Exhibit B have been adapted from the model Technical Specifications in Generic Letter 83-36 to fit the format of the Monticello Technical Specifications. While several deviations from the model Technical Specifications have been made, we believe the proposed changes meet the intent of the NRC Staff requirements in all areas.

Significant Hazards Evaluation

The proposed control room habitability requirements constitute an additional limitation restriction, or control not presently included in the Technical Specification.

For these reasons operation of the Monticello Nuclear Generating Plant in accordance with the proposed changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

2. POST-ACCIDENT SAMPLING

Proposed Changes

Add post-accident sampling requirements as shown in Exhibit B, page 246.

Reason for Change

This implements the requirements of NUREG-0737, Item II.B.3. Wording has been revised to conform precisely with NRC Staff guidelines.

Significant Hazards Evaluation

The proposed post-accident sampling requirements constitute an additional administrative control not presently included in the Technical Specifications.

For these reasons operation of the Monticello Nuclear Generating Plant in accordance with the proposed changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

EXHIBIT B

Revision No. 1 to

License Amendment Request Dated April 3, 1984

Exhibit B, attached, consists of revised pages for the Monticello Nuclear Generating Plant Technical Specifications showing the proposed changes:

Pages

i*

iv

vi

48*

60b (new page)

63

64

69*

70

71

229u through 229z (new pages)

246

* - This page reflects changes included with an earlier License Amendment Request.