UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

REQUEST FOR AMENDMENT TO OPERATING LICENSE DPR-22

REVISION NO. 4 TO LICENSE AMENDMENT REQUEST DATED SEPTEMBER 24, 1982

Northern States Power Company, a Minnesota corporation, requests authorization for changes to Appendix A of the Monticello Operating License as shown on the attachments labeled Exhibits A and B. Exhibit A describes the proposed changes, reasons for the changes, and a significant hazards evaluation. Exhibit B is a copy of the Monticello Technical Specifications incorporating the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By NOG David Musolf Manager-Nuclear Support Services

On this <u>3</u>, <u>d</u> day of <u>Nonember</u> <u>1986</u> 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 is is not interposed for delay.

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DODY A. BROSE NOTARY PUBLIC – MINNESOTA HENNEPIN COUNTY My Commission Expires Dec. 26, 1989



Exhibit A

Monticello Nuclear Generating Plant Revision No. 4 to License Amendment Request Dated September 24, 1982

> Description and Evaluation of Proposed Change to Appendix A of Operating License DPR-22

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

Specification 3.7.A.5, Containment Purge and Vent Operations

Proposed Changes

a. Revise Specification 3.7/4.7.A.5 as shown on Exhibit B page 166 to restrict purge and vent operations above cold shutdown to the 2-inch bypass flow path except for inerting and deinerting containment.

b. Revise containment purge and vent valve surveillance on page 171 to require valve seat seal replacement at five year intervals.

c. Revise the maximum operating time specified for containment purge and vent valve operation to 15 seconds on Table 3.7.1 (with an allowable 20 seconds prior to Cycle 13 startup).

d. Reduce the number of outboard valves listed on Table 3.7.1 for "drywell purge inlet" to one and add a new table entry, "suppression chamber purge inlet" with one outboard valve.

e. Change the normal position specified for all drywell and suppression chamber vent and purge valve to closed on Table 3.7.1.

f. Revise the heading for Section 3/4.7.A.5 to read, "Containment Atmosphere Control." Correct a typographical error on page 165 by changing "Specification 3.7.C.l.(a) through (d)" to read, "Specification 3.7.C.2.(a) through (d)."

Reason for Change

Changes (a) through (c) implement the Commission's established position on containment purge and vent valve operation. These specific changes are being requested as a result of NRC Staff review of our earlier submittal. Additional information related to this issue is contained in our letters dated May 1, 1985 and November 22, 1985. Change (d) is a clarification of Table 3.7.1. Change (e) revises the Table to show the normal position of purge and vent valves following completion of the Mark I Containment Long Term Program and the removal of the drywell-suppression chamber differential pressure. Item (f) contains administrative changes intended to replace a section title a more appropriate title and correct a typographical error.

Item (a)

As noted in the referenced correspondence, limiting purge and vent valve operation above cold shutdown to inerting and deinerting operations effectively limits use of these valves to a small number of hours per year. In addition, the valves are provided with limit stops to ensure they can close against full accident differential pressure (reference NRC Safety Evaluation Report dated February 15, 1985).

Item (b)

Information provided with our November 22, 1985 letter supports an alternative to the NRC Staff's accelerated valve leakage testing recommendation. Actual plant experience with the T-ring seal designed valves at Monticello indicates that these valves have a high degree of leak tightness provided that the seat seal material is properly maintained. Five year seal replacement has been specified in our proposed Technical Specifications.

Item (c)

Change (c) revises the maximum permitted operating time for containment vent and purge valves to 15 seconds following the next refueling outage. As noted in our November 22, 1985 letter, the valves now have a nominal closure time of less than 15 seconds. Normal closure time variance, however, could result in a valve exceeding this closure time about one time per 100 tests. During the 1987 refueling outage we will perform an engineering evaluation of modifications to slightly increase the speed of valve closure. We believe this can be accomplished through relatively simple modifications of the control air piping and components.

Item (d)

Change (d) clarifies the table to more correctly describe the existing plant design (Reference USAR Figure 5.2-9). One of the valves currently described as a drywell purge inlet valve is, in fact, a suppression chamber purge inlet valve.

Item (e)

Change (e) revises the table to show the normal position of all purge and vent valves as normally closed. As an interim measure in the mid-1970's, a drywell to suppression chamber differential pressure was maintained to reduced vent line submergence. This differential pressure required several of these valves to be open to permit the necessary nitrogen makeup to the drywell and suction from the suppression chamber (Reference Amendment 18 to the Monticello Provisional Operating License dated April 14, 1976). This differential pressure is no longer because of containment modification. The valves should be in the closed position during normal operation.

Item (f)

The first change is an administrative change which changes a section heading to more clearly identify the purpose of that section. This section deals with several aspects of containment atmosphere control, not simply control of oxygen. The second change corrects a typographical error in a reference to another Technical Specification Section.

Safety Evaluation and Determination of Significant Hazards Considerations

The proposed changes to Appendix A of the Operating License have been evaluated to determine whether they constitute a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This evaluation is provided below:

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

The proposed amendment would revise the Technical Specifications to conform to NRC Staff requirements related to containment purge and vent valve operability. Each of the proposed changes is an additional restriction placed on these valves. The proposed changes will restrict the period of time they are open, require them to close in a shorter time period, and require proper seal maintenance. These change will reduce the probability of valve failure and thereby reduce the probability and consequences of acoidents previously analyzed. Additional changes to Table 3.7.1, a change to a section heading, and a correction of a typographical error will provide clarification and show the correct normal postion of the containment purge and vent valves. These changes are administrative in nature and have no impact on the probability or consequences of any acoident.

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

Proposed changes (a) through (d) deal exclusively with additional limitations on containment purge and vent valves. There is no potential for a new or different type of acoident. Changes (d) through (f) are administrative in nature and cannot contribute to a new or different type of acoident.

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

The proposed Technical Specification wording changes will place more restrictions on the use of containment purge and vent valves and provide

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clarifying administrative changes to the Tehcnical Specifications. This will reduce the potential for lapse of containment integrity due to failure or improper operation of these components. This will improved the reliability of the Monticello containment system. The proposed change will not, therefore, involve a reduction in the any margin of safety, but will increase these margins.

The Commission has provided guidance concerning the application of the Standards for determining whether a significant hazards consideration exists by providing certain examples of amendments that are considered not likely to involve significant hazards considerations. These examples were published in the Federal Register on March 6, 1986.

Changes (a) through (c) proposed in this License Amendment Request are representative of example (ii). They constitute additional limitations, restrictions, or controls not presently included in the Technical Specifications.

changes (d) throug (f) proposed in this License Amendment Request are representative of example (i). They constitute administrative changes to achieve consistency and correct errors.

EXHIBIT B

Revision No. 4 to License Amendment Request Dated September 24, 1982 Docket No. 50-263 License No. DPR-22

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

> Pages: 165 166 171 172