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

LICENSE AMENDMENT REQUEST DATED APRIL 9, 1987

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, B, and C. Exhibit A describes the proposed changes, describes the reasons for the changes, and contains a significant hazards evaluation. Exhibits B and C are copies of the Monticello Technical Specifications incorporating the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By David Musolf
David Musolf
Manager-Nuclear Support Services

On this 9th day of April 1987 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.

Dody A. Brose

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

Exhibit A

Monticello Nuclear Generating Plant
License Amendment Request Dated April 9, 1987

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:

1. Section 4.6.H, Snubber Surveillance Intervals

Proposed Changes

a. Change Specification 4.0.B on page 25a to read, "...the intervals between tests scheduled once each operating cycle or tests scheduled for refueling shutdown shall not exceed two years."

b. Change "18 months ± 25%" to "Once Each Operating Cycle" in Specification 4.6.H.1 on page 129 and Specification 4.6.H.3 on page 131.

Refer to Exhibit B.

Reason for Changes

The Technical Specifications currently require snubber inspection (with no inoperable snubbers found during the previous inspection) and functional testing to be conducted at 18-month intervals, plus or minus 25%. A literal interpretation of this requirement would require refueling outages to fall within an 18 month interval, plus or minus 25%, also. Inaccessible snubbers can only be inspected during plant shutdown. Function testing involves snubber removal and can only be safely performed during plant shutdown.

The intent of the Technical Specifications is to require testing during plant shutdown and to ensure an upper limit on the interval between any two tests. Up to now, outages have fallen within the 18 month + 25% band. However, cycle lengths are typically less than 18 months and after a succession of cycles less than 18 months in length, it becomes impossible to conduct the testing during subsequent scheduled refueling outage. This may be the case for the 1989 refueling outage and future outages.

The revision to Specification 4.0.B will provide assurance that an upper limit on test interval of 24 months is maintained. This is only slightly longer than 18 months + 25%.

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 accident previously evaluated.

   The proposed amendment would revise the Technical Specifications to correct two unintentionally restrictive surveillance intervals for hydraulic snubbers. While the upper limit on the interval between two tests or inspections could increase from 18 months + 25% (22.5 months) to 24 months in the event of a long fuel cycle, this increase would not significantly affect the reliability of safety related hydraulic snubbers.

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

   The proposed Technical Specification changes deal exclusively with the interval between successive hydraulic snubber inspections and functional tests. Proper functioning of snubbers is necessary to ensure protection of safety related piping systems during seismic events and to prevent damage during normal plant operation from snubbers that are "locked up." Inspection of inaccessible snubbers and functional testing can only be performed during plant outages. The proposed changes to the Technical Specifications would reflect this fact without significantly changing the maximum allowed interval between inspections and tests. There is therefore no possibility for a new or different type of accident from any previously analyzed.

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

   The proposed Technical Specification wording changes can, under worst case circumstances, lead to an increase in surveillance interval for inspection of inaccessible snubbers

and snubber functional testing of 1.5 months over the current maximum interval of 22.5 months. Current cycle lengths are significantly shorter than 24 months and actual test intervals are not expected to change. These Technical Specification changes will therefore have no significant impact on hydraulic snubber reliability or reduce any margin of safety.

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 proposed in this License Amendment Request are representative of example (i) since they are intended to achieve consistency and correct an unintentional error.

2. Integrated Leakage Rate Test Interval

Proposed Change

In Specification 4.7.A.2.a.1 on page 157, add a "*" after the word "intervals" and delete the existing "*". Change the footnote to read:

> * The second test of the second 10-year service period may be conducted during the 1989 refueling outage.

Refer to Exhibit B.

Reason for Change

The Technical Specifications require a test interval of 40 months ± 10 months for overall integrated containment leakage rate tests. It is also required that the last test in a 10-year service period coincide with the refueling outage during which the 10-year inservice inspection is conducted. At Monticello, we will be unable to comply with both of these requirements during the remainder of the current 10-year service period.

Refueling outages are currently scheduled for October, 1987 and April, 1989. The 10-year inspection refueling outage is scheduled for June, 1992. It is proposed that tests be conducted in 1989 and 1992. This would make the interval between the last test (January, 1985) and the 1989 test (which will occur at the end of the 1989 outage) approximately 53 months. This exceeds the maximum allowable interval by three months. Therefore a

Technical Specification change is requested to permit this short extension in test interval. Other alternatives to ILRT scheduling would also require a Technical Specification relief.

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 accident previously evaluated.

   The proposed amendment would revise the Technical Specifications to allow approximately a three month extension in the maximum specified interval between integrated containment leak rate tests of 50 months. This is an insignificant change and cannot increase the probability or consequences of a previously analyzed accident.

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

   The proposed Technical Specification change deals exclusively with the interval between successive containment leakage tests. This test can only be performed during refueling outages. Due to the current outage schedule, the requirement for test intervals of 40 $\pm$ 10 months and the requirement that the last test of a series be conducted during the 10-year ASME Code Section XI inservice inspection outage cannot both be met. The proposed minor increase in specified test interval to allow a test in 1989 will resolve this conflict. The change is minor and there is no possibility for a new or different type of accident from any previously analyzed.

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

   The proposed Technical Specification wording change will lead to an interval between containment leakage tests of greater than 50 months. The increase, which will be just a few months, does not significantly reduce any margin of safety,

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 proposed in this License Amendment Request are representative of example (i) since it is a administrative change needed to resolve conflicting Technical Specification requirements related to test scheduling.