

Exhibit A

Monticello Nuclear Generating Plant

Revision No. 2 to the  
License Amendment Request Dated July 27, 1987

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

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

1) Cycle 13 Changes

Proposed Changes

- a) Delete Section 3.3.C.3, Table 3.11.2 and associated Bases (page vii, 82, 90, 215, 217, 218).
- b) Delete MAPLHGRs for fuel types 8DB262, 8DB250, 8DB219L, 8DRB282 and 8DRB265L. Add MAPLHGRs for fuel types BD319B and other GE8 fuel types. (page 214, Table 3.11.1)
- c) Change the MCPRs for all fuel types for all scram times to 1.30 (page 213 and 215, Table 3.11.2).
- d) Change the MCPR assumed in the postulated loss-of-coolant accident to be 1.24 (page 216).
- e) Change paragraph 3.11.A to refer to the MAPLHGR limits generated by approved methodology for the process computer and to Table 3.11.1 for the limits for hand calculations.
- f) Modify the Bases of Section 2.3 to refer to NEDE-24011-P-A (pages 14 and 20).
- g) Add the LHGR limit for GE8 fuel to Section 3.11.B (page 212) and refer to GE8 fuel on Figure 3.11.2 (page 215b).
- h) Replace the action statements for MAPLHGR, LHGR and MCPR with the following statement from the Standard Technical Specifications:  
"reduce thermal power to less than 25% within the next 4 hours."

8709220461 870916  
PDR ADOCK 05000263  
P PDR

## Reason for Changes

- a) Since the MCPR proposed is higher than the Option A and B setpoints supported in Exhibit C, all references to the MCPR limit varying as a function of scram time are proposed to be deleted.
- b) A new fuel type will be added in Cycle 13, GE 8 fuel designated "BD319B". MAPLHGRs for this fuel type have been added.

Several fuel types will not be used in the future and those MAPLHGRs have been deleted.

A new column of MAPLHGRs has been added. This column provides a conservative projection of future GE 8 MAPLHGRs (approximately BD319B minus 0.5 kw/ft). If this column is shown to be conservative for future fuel types, this would increase the likelihood that the future reload could be done under 10 CFR Part 50, Section 50.59.

- c) The MCPR for all fuel types and all scram times is proposed to be 1.30. The Supplemental Reload Licensing Submittal for Monticello (Exhibit C) allows MCPRs down to 1.29 to 1.24 for Option A and B respectively. A previous License Amendment Request dated February 4, 1987 changed the Rod Block Monitor (RBM) setpoints assuming a minimum MCPR of 1.30 (approved on August 8, 1987). Therefore, to remain consistent with the RBM setpoints approved August 8, 1987, the minimum MCPR could only be lowered to 1.30. The Supplemental Reload Licensing Submittal refers to a value of 1.20, since the February 4, 1987 License Amendment had not been approved at the time it was prepared.
- d) This change corrects an error made in the License Amendment Request dated 5/30/84. The 5/30/84 change implemented the "ARTS" change into the Technical Specifications. The ARTS documentation (NEDC-30492-P) has an option to decrease the initial MCPR assumed in the analysis from 1.28 to 1.24 for less than rated flow/power conditions. This can be seen on Figure 3.11.2 in the Monticello Technical Specifications in the boxed legend. The current, rated flow, Loss of Coolant Analysis assumes a minimum initial MCPR of 1.24 (See NEDO-24050-1, submitted 2/6/81). Therefore, it is correct to change the 1.28 to 1.24.
- e) This change specifies the use of limits generated by NRC approved methodology to be used for normal monitoring and specifies the use of Table 3.11.1 for hand calculations. Since the new fuel type proposed to be added for Cycle 13 operation has axially zoned Gadolinia, there are MAPLHGRs for each of the four axial regions. We propose to avoid adding this much detail to the Technical Specifications and instead propose that these limits be referenced in the applicable section of the Technical Specifications. MAPLHGRs for hand calculations are conservative for all four regions.
- f) Outdated wording is deleted and General Electric recommends that GESTAR be referenced in its place.

- g) GE8 fuel has a higher LHGR than previously used General Electric fuel types.
- h) The existing specification requires that the plant be placed in cold shutdown after 36 hours. There is no need to take the plant to cold shutdown since the thermal limits only apply when thermal power is above 25%. The proposed wording is taken from the Standard Technical Specifications.

Safety Evaluation and Determination of Significant Hazards Considerations

The proposed change 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.

The proposed changes allow the operation of Cycle 13 of the Monticello Nuclear Generating Plant. The methods used are General Electric's advanced reload licensing methods known as GEMINI. This methodology has been reviewed and found acceptable by the NRC Staff (Reference 1). The results of the analysis meet all acceptance criteria and therefore, will not involve a significant increase in the probability or consequences of accidents previously analyzed.

The new wording for the action statements for MAPLHGR, LHGR and MCPFR conforms to guidance provided by the Standard Technical Specifications and will not significantly affect the probability or consequences of accidents previously analyzed.

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

Since the fuel used in Cycle 13 is very similar to that used in past cycles and the core will be operated in a similar manner, this amendment will not create the possibility of a new or different kind of accident.

The new wording for the action statements for MAPLHGR, LHGR and MCPFR conforms to guidance provided by the Standard Technical Specifications and will not create the possibility of a new or different kind of accident.

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

Since the safety analyses of Cycle 13 meets all acceptance criteria, this change will not involve a significant reduction in the margin of safety.

The new wording for the action statements for MAPLHGR, LHGR and MCPR conforms to guidance provided by the Standard Technical Specifications and will not involve a significant reduction in the margin of safety.

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 Technical Specifications proposed in this amendment request are representative of NRC example iii, because the change is associated with a reloading, where no fuel assemblies significantly different from those found previously acceptable to the NRC for a previous core at Monticello are used, no significant changes have been made to the acceptance criteria for the Technical Specifications, and the methods used, although changed from the previous cycle, have been found to be acceptable by the NRC Staff. Based on this guidance and the reasons discussed above, we have concluded that the proposed changes do not involve a significant hazards consideration.

2) New Figure 3.5-1

Proposed Changes

Replace Figure 3.5-1 with the attached figure.

Reason for Changes

The requirements for Single Loop Operation are complicated and this figure has been revised to assist the operator by labeling the allowed and prohibited areas of operation.

Safety Evaluation and Determination of Significant Hazards Considerations

The proposed change 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.

This change is an administrative change which will not affect the probability or consequences of evaluated accidents.

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

For the reasons mentioned above, the proposed change will not create the possibility of a new or different kind of accident.

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

Since this is an administrative change, it will not involve a significant reduction in the margin of safety.

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 Technical Specifications proposed in this amendment request are representative of NRC example (i): because they involve administrative changes to the Technical Specifications. Based on this guidance and the reasons discussed above, we have concluded that the proposed changes do not involve a significant hazards consideration.

- 3) Description of the Control Rods (page 230)

#### Proposed Changes

Add "whose design has been reviewed and approved for BWR use by an NRC Safety Evaluation Report" to Section 5.2.B. Delete "except for the Hybrid I control rods which contain approximately 15%" and add "or" to the description of the control rod material in Section 5.2.B.

#### Reason for Changes

In the future, when obtaining replacement control rods, we do not want to be limited to the two designs currently described in Section 5.2.B. This change would allow the use of designs approved for BWR use by the NRC Staff to be used at Monticello without the need for a license amendment each time a new design is approved.

#### Safety Evaluation and Determination of Significant Hazards Considerations

The proposed change 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.

This change will allow the use of other control rods approved for use by the NRC Staff. Since the design will have been approved by the NRC Staff and reviewed for use by NSP, there will not be a significant increase in the probability or consequences of evaluated accidents.

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

For the reasons mentioned above, the proposed change will not create the possibility of a new or different kind of accident.

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

Since all future control rods will have been approved for use by the NRC Staff, this change will not involve a significant reduction in the margin of safety.

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 Technical Specifications proposed in this amendment request are representative of NRC example (i): because they involve administrative changes to the Technical Specifications. Based on this guidance and the reasons discussed above, we have concluded that the proposed changes do not involve a significant hazards consideration.

References:

- 1). Letter form C O Thomas (NRC) to J S Charnley (GE) "Acceptance for Referencing of Licensing Topical Report NEDE-24011-P-A, Rev 6, Amendment 11, "General Electric Standard Application for Reactor Fuel" (GESTAR II) date November 5, 1985.