Exhibit B

License Amendment Request dated August 31, 1988

Docket No. 50-263
License No. DPR-22

Exhibit B consists of marked up pages for the Monticello Nuclear Generating Plant Technical Specifications showing the proposed changes as listed below:

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Bases Continued:

that indicated by the neutron flux at the scram setting. Analyses demonstrate that, with a 120% scram trip setting, none of the abnormal operational transients analyzed violate the fuel Safety Limit and there is a substantial margin from fuel damage. Therefore, the use of flow referenced scram trip provides even additional margin.

For operation in the startup mode while the reactor is at low pressure, the IRM scram setting of 20% of rated power provides adequate thermal margin between the setpoint and the safety limit, 25% of rated. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. Effects of increasing pressure at zero or low void content are minor, cold water from sources available during startup is not much colder than that already in the system, temperature coefficients are small, and control rod patterns are constrained to be uniform by operating procedures.

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Bases Continued:

backed up by the rod worth minimizer. Worth of individual rods is very low in a uniform rod pattern. Thus, of all possible sources of reactivity input, uniform control rod withdrawal is the most probable cause of significant power rise. Because the flux distribution associated with uniform rod withdrawals does not involve high local peaks, and because several rods must be moved to change power by a significant percentage of rated power, the rate of power rise is very slow. Generally, the heat flux is in near equilibrium with the fission rate. In an assumed uniform rod withdrawal approach to the scram level, the rate of power rise is no more than 5% of rated power per minute, and the IRM system would be more than adequate to assure a scram before the power could exceed the safety limit. The IRM scram remains active until the mode switch is placed in the run position and the associated APRM is not downscale. This switch occurs when reactor pressure is greater than 850 psig.

The operator will set the APRM neutron flux trip setting no greater than that stated in Specification 2.3.A.1. However, the actual setpoint can be as much as 3% greater than that stated in Specification 2.3.A.1 for recirculation driving flows less than 50% of design and 2% greater than that shown for recirculation driving flows greater than 50% of design due to the deviations discussed on page 39.

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3.0 LIMITING CONDITIONS FOR OPERATION

2. Primary Containment Integrity

   a. Primary Containment Integrity, as defined in Section 1, shall be maintained at all times when the reactor is critical or when the reactor water temperature is above 212°F and fuel is in the reactor vessel, except when performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t). Without Primary Containment Integrity, restore Primary Containment Integrity within one hour or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours.

4.0 SURVEILLANCE REQUIREMENTS

2. Primary Containment Integrity

   a. Primary Containment Integrity shall be demonstrated after each closing of each penetration subject to Type B testing, if opened following a Type A or Type B test, by leak rate testing the seal with gas at ≥ Pa, 42 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Surveillance Requirement 4.7.A.2.b.~~(a)~~ for all other Type B and C penetrations, the combined leakage rate is less than or equal to 0.6La. (5)

4. The accuracy of each Type A test shall be verified by a supplemental test which:

   a. Confirms the accuracy of the test by verifying that the difference between the supplemental data and the Type A test data is within 0.25La, and

   b. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test, and

   c. Requires the rate of gas injected into the containment or bled from the containment during the supplemental test to be limited between 75 to 125% of La.

(5.) ~~4.~~ Type B and C tests shall be conducted with gas at ≥ Pa at each refueling shutdown (maximum interval of 24 months), except for tests involving the main steam line isolation valves. Main steam isolation valve tests shall be conducted with gas at ≥ 25 psig each 18 months. A combined leakage rate of ≤ 0.6La shall be demonstrated for all penetrations and valves, except for main steam line isolation valves, subject to Type B and C tests. A leakage rate of ≤ 11.5 scf per hour shall be demonstrated for each main steam line isolacion valve.

3.0 LIMITING CONDITIONS FOR OPERATION

c. When Primary Containment Integrity is required, the primary containment airlock shall be operable with:

1. Both doors closed except when the airlock is being used, then at least one airlock door shall be closed, and

2. An overall airlock leakage rate of less than or equal to 0.05La at Pa or 0.007La at 10 psig.

With the primary containment airlock inoperable, maintain at least one airlock door closed and restore the airlock to Operable status within 24 hours or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours.

4.0 SURVEILLANCE REQUIREMENTS

c. The primary containment airlock shall be demonstrated operable:

1. At each refueling shutdown, and at six month intervals thereafter, by conducting an overall airlock leakage test at $\geq$ Pa and demonstrating that overall airlock leakage rate is $\leq$ 0.05La. This test interval may be extended up to the next refueling outage (up to a maximum interval between tests at Pa of 24 months) if there have been no air lock openings since the last successful test at Pa.

2. After each opening by conducting an overall airlock leakage test at $\geq$ 10 psig and verifying the leakage rate is $\leq$ 0.007La. If the airlock is being used for multiple openings, this test is not required after each opening, but shall be performed at least once per 72 hours.

3. At six month intervals by verifying that only one door can be opened at a time. If the airlock has not been used since the last door interlock test, this test is not required.

d. The interior surfaces of the drywell shall be visually inspected each operating cycle for evidence of deterioration.

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3.0 LIMITING CONDITIONS FOR OPERATION

b. If both standby gas treatment system circuits are not operable, within 36 hours the reactor shall be placed in a condition for which the standby gas treatment system is not required in accordance with Specification 3.7.C.~~1~~.(a) through (d). 2

2. Performance Requirement

a. Periodic Requirements

(1) The results of the in-place DOP tests at 3500 cfm (±10%) on HEPA filters shall show ≤1% DOP penetration.

(2) The results of in-place halogenated hydrocarbon tests at 3500 cfm (±10%) on charcoal banks shall show ≤1% penetration.

(3) The results of laboratory carbon sample analysis shall show ≥90% methyl iodine removal efficiency when tested at 130°C, 95% R.H.

4.0 SURVEILLANCE REQUIREMENTS

b. If both standby gas treatment system circuits are not operable within 7 days, within 36 hours verify that the conditions of Specification 3.7.C.~~1~~.(a) through (d) are satisfied. 2

2. Performance Requirement Tests

a. At least once per 720 hours of system operation; or once per operating cycle, but not to exceed 18 months, whichever occurs first; or following painting, fire, or chemical release in any ventilation zone communicating with the system while the system is operating that could contaminate the HEPA filters or charcoal adsorbers, perform the following:

(1) In-place DOP test the HEPA filter banks.

(2) In-place test the charcoal adsorber banks with halogenated hydrocarbon tracer.

(3) Remove one carbon test canister from the charcoal adsorber. Subject this sample to a laboratory analysis to verify methyl iodide removal efficiency.

Exhibit C

License Amendment Request dated August 31, 1988

Docket No. 50-263
License No. DPR-22

Exhibit C consists of revised pages for the Monticello Nuclear Generating Plant Technical Specifications with the proposed changes incorporated as listed below:

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Bases Continued:

that indicated by the neutron flux at the scram setting. Analyses demonstrate that, with a 120% scram trip setting, none of the abnormal operational transients analyzed violate the fuel Safety Limit and there is a substantial margin from fuel damage. Therefore, the use of flow referenced scram trip provides even additional margin.

For operation in the startup mode while the reactor is at low pressure, the IRM scram setting of 20% of rated power provides adequate thermal margin between the setpoint and the safety limit, 25% of rated. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. Effects of increasing pressure at zero or low void content are minor, cold water from sources available during startup is not much colder than that already in the system, temperature coefficients are small, and control rod patterns are constrained to be uniform by operating procedures backed up by the rod worth minimizer. Worth of individual rods is very low in a uniform rod pattern. Thus, of all possible sources of reactivity input, uniform control rod withdrawal is the most probable cause of significant power rise. Because the flux distribution associated with uniform rod withdrawals does not involve high local peaks, and because several rods must be moved to change power by a significant percentage of rated power, the rate of power rise is very slow. Generally, the heat flux is in near equilibrium with the fission rate. In an assumed uniform rod withdrawal approach to the scram level, the rate of power rise is no more than 5% of rated power per minute, and the IRM system would be more than adequate to assure a scram before the power could exceed the safety limit. The IRM scram remains active until the mode switch is placed in the run position and the associated APRM is not downscale. This switch occurs when reactor pressure is greater than 850 psig.

The operator will set the APRM neutron flux trip setting no greater than that stated in Specification 2.3.A.1. However, the actual setpoint can be as much as 3% greater than that stated in Specification 2.3.A.1 for recirculation driving flows less than 50% fo design and 2% greater than that shown for recirculation driving flows greater than 50% of design due to the deviations discussed on page 39.

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3.0 LIMITING CONDITIONS FOR OPERATION	4.0 SURVEILLANCE REQUIREMENTS

3.0 LIMITING CONDITIONS FOR OPERATION

2. Primary Containment Integrity

   a. Primary Containment Integrity, as defined in Section 1, shall be maintained at all times when the reactor is critical or when the reactor water temperature is above 212°F and fuel is in the reactor vessel, except when performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t). Without Primary Containment Integrity, restore Primary Containment Integrity within one hour or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours.

4.0 SURVEILLANCE REQUIREMENTS

2. Primary Containment Integrity

   a. Primary Containment Integrity shall be demonstrated after each closing of each penetration subject to Type B testing, if opened following a Type A or Type B test, by leak rate testing the seal with gas at $\geq$ Pa, 42 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Surveillance Requirement 4.7.A.2.b.5 for all other Type B and C penetrations, the combined leakage rate is less than or equal to 0.6La.

3.0 LIMITING CONDITIONS FOR OPERATION	4.0 SURVEILLANCE REQUIREMENTS

4. The accuracy of each Type A test shall be verified by a supplemental test which:

   a. Confirms the accuracy of the test by verifying that the difference between the supplemental data and the Type A test data is within 0.25La, and

   b. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test, and

   c. Requires the rate of gas injected into the containment or bled from the containment during the supplemental test to be limited between 75 to 125% of La.

5. Type B and C tests shall be conducted with gas at $\geq$ Pa at each refueling shutdown (maximum interval of 24 months), except for tests involving the main steam line isolation valves. Main steam isolation valve tests shall be conducted with gas at $\geq$ 25 psig each 18 months. A combined leakage rate of $\leq$ 0.6 La shall be demonstrated for all penetrations and valves, except for main steam line isolation valves, subject to Type B and C tests. A leakage rate of $\leq$ 11.5 scf per hour shall be demonstrated for each main steam line isolation valve.

3.0 LIMITING CONDITIONS FOR OPERATION

c. When Primary Containment Integrity is required, the primary containment airlock shall be operable with:

1. Both doors closed except when the airlock is being used, then at least one airlock door shall be closed, and

2. An overall airlock leakage rate of less than or equal to 0.05 La at Pa or 0.007La at 10 psig.

With the primary containment airlock inoperable, maintain at least one airlock door closed and restore the airlock to Operable status within 24 hours or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours.

4.0 SURVEILLANCE REQUIREMENTS

c. The primary containment airlock shall be demonstrated operable:

1. At each refueling shutdown, and at six month intervals thereafter, by conducting an overall airlock leakage test at $\geq$ Pa and demonstrating that overall airlock leakage rate is $\leq$0.05 La. This test interval may be extended up to the next refueling outage (up to a maximum interval between tests at Pa of 24 months) if there have been no air lock openings since the last successful test at Pa.

2. After each opening by conducting an overall airlock leakage test at $\geq$ 10 psig and verifying the leakage rate is $\leq$ 0.007 La. If the airlock is being used for multiple openings, this test is not required after each opening, but shall be performed at least once per 72 hours.

3. At six month intervals by verifying that only one door can be opened at a time. If the airlock has not been used since the last door interlock test, this test is not required.

d. The interior surfaces of the drywell shall be visually inspected each operating cycle for evidence of deterioration.

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3.0 LIMITING CONDITIONS FOR OPERATION

b. If both standby gas treatment system circuits are not operable, within 36 hours the reactor shall be placed in a condition for which the standby gas treatment system is not required in accordance with Specification 3.7.C.2.(a) through (d).

2. Performance Requirements

a. Periodic Requirements

(1) The results of the in-place DOP tests at 3500 cfm (±10%) on HEPA filters shall show ≤1% DOP penetration.

(2) The results of in-place halogenated hydrocarbon tests at 3500 cfm (±10%) on charcoal banks shall show ≤1% penetration.

(3) The results of laboratory carbon sample analysis shall show ≥90% methyl iodine removal efficiency when tested at 130°C, 95% R.H.

4.0 SURVEILLANCE REQUIREMENTS

b. If both standby gas treatment system circuits are not operable within 7 days, within 36 hours verify that the conditions of Specification 3.7.C.2.(a) through (d) are satisfied.

2. Performance Requirement Tests

a. At least once per 720 hours of system operation; or once per operating cycle, but not to exceed 18 months, whichever occurs first; or following painting, fire, or chemical release in any ventilation zone communicating with the system while the system is operating that could contaminate the HEPA filters or charcoal absorbers, perform the following:

(1) In-place DOP test the HEPA filter banks.

(2) In-place test the charcoal adsorber banks with halogenated hydrocarbon tracer.

(3) Remove one carbon test canister from the charcoal adsorber. Subject this sample to a laboratory analysis to verify methyl iodine removal efficiency.