

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 January 31, 1991

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

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

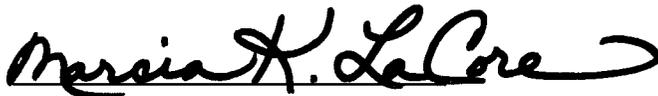
By


Thomas M Parker

Manager

Nuclear Support Services

On this 31st day of January, 1991 before me a notary public in and for said County, personally appeared Thomas M Parker, 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

License Amendment Request dated January 31, 1991

Evaluation of Proposed Changes to the Technical Specifications
for Operating License DPR-22

Pursuant to 10 CFR Part 50, Section 50.59 and 50.90, the holders of Operating License DPR-22 hereby propose changes to the ECCS flow changes associated with the SAFER/GESTR LOCA Analysis and reorganization of Section 3.5/4.5. The SAFER/GESTR analysis is proprietary and will be sent under separate cover.

All the Emergency Core Cooling Systems (ECCS) have been placed in one section, 3.5.A. Presently, the systems are spread out into five sections 3.5.A, B, D and E. This change is consistent with the Standardized Technical Specification treatment of the ECCS systems.

Existing Sections:

- A. Core Spray System
- B. LPCI Subsystem
- C. RHR Service Water
- D. HPCI system
- E. ADS
- F. RCIC
- G. Minimum Core and
Containment Cooling
System Availability
- H. Recirculation System

Proposed Sections:

- A. ECCS Systems
- B. RHR Intertie Line
- C. Containment Spray/Cooling
- D. RCIC
- E. Cold Shutdown and Refueling
Requirements
- F. Recirculation System

The requirements of existing Sections A, B, D and E were combined into proposed Section A.

Existing Section B became proposed Section C.

Existing Section G was renamed and became proposed Section E.

The following sections were relocated:

Existing Section 3.5.A.4 was moved to the surveillance requirements, Section 4.5.A.1.

Existing Section 3.5.B.5 was moved to the surveillance requirements, Section 4.5.A.2.

Existing Section 3.5.C.4 was moved to the surveillance requirements, Section 4.5.C.1.

Existing Section 3.5.D.3.a was moved to the surveillance requirements, Section 4.5.A.4.

Existing Sections 3.5.F.1.b, 3.5.D.3.b and c were deleted.

The action statements (allowed out-of-service times) associated with these sections have been modified to be consistent with a previously submitted License Amendment Request dated December 13, 1990.

<u>Proposed Section:</u>	<u>Proposed Change and Reason for the Change:</u>
3.5.A.1	This proposed section contains the operability requirements for the low pressure ECCS systems from existing sections: 3.5.A.1 and B.1.
3.5.A.2	This proposed section contains the operability requirements for the high pressure ECCS systems from existing sections: 3.5.D.1 and E.1.
3.5.A.3	This proposed section contains the "action statements" for the ECCS systems from existing sections 3.5.A.2, B.2, B.3, D.2, E.3 and E.3.

Section 3.5.A.3 has been deleted. The new analysis does not analyze two Core Spray pumps being inoperable at the same time.

This change will clarify the requirements when multiple ECCS components are inoperable. Since all the ECCS equipment action statements are listed in Section 3.5.A.2, it is very clear what actions are required for different combinations of inoperable equipment. For example, existing Section 3.5.D.2 requires the Core Spray System to be operable if HPCI is inoperable. However, the Core Spray specification (3.5.A.2) does not mention that HPCI must be operable if a Core Spray pump is inoperable. In order to eliminate the necessity of cross checking, all the ECCS equipment was placed in one proposed section (3.5.A).

Section 3.5.A.3.c allows one low pressure ECCS pumps to be inoperable in addition to one ADS valve. This condition is allowed in the existing specifications since the equipment is located in different sections and not cross referenced.

3.5.A.4	This proposed section contains the actions to take if sections 3.5.A.1 or 2 cannot be met. These actions are from existing sections 3.5.A.5, B.8, D.4 and E.4. The wording was changed to cover both the equipment required to operable above 212 °F and equipment required to be operable above 150 psig.
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3.5.B This proposed section contains the requirements for the RHR Intertie Return Line isolation valves. The reference to existing section 3.5.B.3 has been deleted.

These valves are related to the ECCS systems but due to their special requirements were placed in a separate section of their own.

Section 3.5.B.1 identifies that the valves need only be operable in the RUN mode.

Proposed section 3.5.B.3 has been added to identify what action should be taken if the action statements in section 3.5.B.2 cannot be met. A time of 24 hours was used to be consistent with the required times in other sections (i.e., 3.5.A.4, 3.5.C.5, 3.5.D.4 etc.).

3.5.C Proposed section 3.5.C combines the Drywell Sprays (existing section 3.5.B.4) and the RHR Service Water System (existing section 3.5.C) into one section. The Torus Cooling function has been added to the Technical Specifications. Since these functions, RHR Service Water, RHR, Drywell Spray and Torus Cooling are all related to one-another, they were grouped together into Containment Spray/Cooling Subsystems.

Existing section 3.5.C.4 was moved to the surveillance requirements, Section 4.5.C.1.

3.5.D The RCIC section has been re-numbered (existing Section 3.5.F). The operability requirements have been deleted since the definition of operability covers these conditions.

Existing section 3.5.F.1.a was moved to the surveillance requirements, Section 4.5.D.1.

3.5.E This is existing Section 3.5.G.

3.5.F This is existing Section 3.5.H.

4.5.A The surveillance requirements for the ECCS systems have been grouped into this section. Flow requirements for the Core Spray, RHR and HPCI pumps have been moved from the Limiting Conditions for Operation to the Surveillance requirements as is done in the Standardized Technical Specifications.

The required flows have been reduced in accordance with the new Loss of Coolant Accident analysis performed using the NRC approved SAFER/GESTR-LOCA Application Methodology. A copy of the analysis report, "Monticello SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis" NEDC-31768P, will be submitted under separate cover.

The proposed changes reflect the flow rates used in the SAFER/GESTR analysis.

- 4.5.B This is a new requirement which is necessary since the RHR Intertie Return Line Isolation Valves are covered by their own section. Previously, their testing was covered by existing Section 4.5.B.
- 4.5.C This proposed section combines the RHR Service Water and Drywell Spray surveillance requirements. Flow requirements for the RHR Service Water pumps have been moved from the Limiting Conditions for Operation to the Surveillance requirements as is done in the Standardized Technical Specifications.
- 4.5.D This proposed section contains the surveillance requirements of existing Section 4.5.F. Flow requirements for the RCIC pump have been moved from the Limiting Conditions for Operation to the Surveillance requirements as is done in the Standardized Technical Specifications.
- 4.5.F Existing Section 4.5.H has been re-numbered.
- Bases The Bases for Section 3.5/4.5.a has been rewritten using the Standardized Technical Specifications Bases as a guide.

Determination of Significant Hazards Considerations

The proposed changes 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 reorganization of Section 3.5 will not affect the probability or consequences of an accident since the same basic requirements exist only in a different form.

The attached analysis demonstrates compliance with 10 CFR Part 50, Section 50.46 criteria as did the previous LOCA analysis. Therefore, this change will not effect the probability or consequences of previously analyzed accidents.

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

No hardware or operating changes are being made so there is no possibility

that these changes will create a new or difference kind of accident.

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

Although lower flow rates for ECCS pumps are allowed under this change, the associated LOCA analysis (See Exhibit D) demonstrates conformance with 10 CFR Part 50, Section 50.46 and Appendix K. Therefore, there is not a significant reduction in the margin for 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 change to the Monticello Operating License proposed in this amendment request are similar to NRC example (iv). Example (iv) applies in this case since the proposed change may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. The new SAFER/GESTR analysis does meet all acceptance criteria and the methodology has been reviewed and approved 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.

Environmental Assessment

This license amendment request does not change effluent types or total effluent amounts nor does it involve an increase in power level. The changes are administrative in nature. Therefore, this amendment will not result in any significant environmental impact.

Exhibit B

Monticello Nuclear Generating Plant

License Amendment Request dated January 31, 1991

REVISED TECHNICAL SPECIFICATION PAGES

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

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Delete Pages 114a thru 120

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