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 June 13, 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, B, and C. Exhibit A describes the proposed changes, describes the reasons for the changes, and contains a significant hazards evaluation. Exhibit B contains current Technical Specification pages marked up with the proposed changes. Exhibit C 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 _____
Thomas M Parker
Manager
Nuclear Support Services

On this 13th day of June 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.

Marcia K. LaCore

MARCIA K. LaCORE
NOTARY PUBLIC—MINNESOTA
HENNEPIN COUNTY
My Commission Expires Sept. 24, 1993

Exhibit A

MONTICELLO NUCLEAR GENERATING PLANT

License Amendment Request Dated June 13, 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 the following changes to the Monticello Technical Specifications:

1. Drywell - Suppression Chamber Vacuum Breaker Test Switches

Section	Proposed Change
3.7.A.4.d	Delete the words "...using the exercise test push button...".
3.7.A (Bases)	Delete the sentence "The remote test panel consists of ..." beginning on the bottom of page 179 and concluding at the top of page 180. Replace the sentence with the following: "The remote test panels consist of indication and controls in the control room and indication in the reactor building. The control room indication and controls for the drywell to suppression chamber vacuum breakers consist of one red light and one green light for each of the eight valves, a common vacuum breaker selector switch, and a common test switch. The reactor building vacuum breaker panel contains one red light and one green light for each of the eight valves."

Reason For Change:

The drywell - suppression chamber vacuum breakers are provided with test switches that allow cycling of the vacuum breakers for testing and to assist in purging air or nitrogen from the suppression chamber vent header during containment inerting and deinerting operations. The test switches (one for each vacuum breaker) were previously of the push button design and are described as such in Section 3.7.A.3.d and of the Technical Specifications. The Primary Containment Bases section of the Technical Specification (pages 179 and 180) also describes these test switches as being of the push button design.

As part of the Human Factors Upgrade project, the individual push button test switches were removed from panel C04 in the control room and replaced with a vacuum breaker selector switch and a single common test

switch during the 1989 refueling outage. There were two primary reasons for this change:

a. With individual push buttons, it was possible to inadvertently depress more than one switch at a time, thereby cycling more than one vacuum breaker at a time in violation of the Technical Specifications. The new selector switch eliminated this concern since it enables a single test circuit at any given time.

b. The push button design was identified as a potential contributor to operator fatigue since it was necessary to hold the switch button against spring pressure for the duration of the test cycle. The new test switch, which is of the rotary design, is provided with a detent.

The purpose of this proposed amendment is to eliminate reference to a specific switch type in the Technical Specifications. It is not the intent of the Technical Specifications to require a particular switch design, since any number of alternate designs could serve satisfactorily. The proposed new wording in the bases section reflects the current switch configuration and provides a more accurate overall description of the vacuum breaker test panels.

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:

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

The proposed amendment does not change the original intent of the Technical Specifications regarding usage of the test switches. The new switch configuration is considered functionally equivalent to the previous configuration.

It is now recognized that by providing a detent for the common test switch, it is possible that an operator could become distracted and forget to return the switch to the closed position, resulting in a vacuum breaker remaining open. As a design enhancement, it is our intention to install a common test switch of a different design to eliminate the possibility of this occurrence.

In the interim, a safety review was completed to confirm that the existing design is acceptable for short term operation. The safety review noted that other factors serve to preclude the possibility of operator error associated with the use of a detent switch. These factors include control room annunciation of vacuum

breaker position and procedural controls which require independent confirmation of vacuum breaker closure after cycling. When these factors are taken into account, the possibility of an accident resulting from an operator failure to return the test switch is calculated to be 2.1E-8 events per year, well below the NRC threshold risk value of 1E-7 events per year provided in NUREG-0800, dated November, 1978.

It is therefore concluded that there is no significant increase in the probability or consequences of an accident previously analyzed.

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

An accident involving a drywell - suppression chamber vacuum breaker being open during a LOCA has previously been analyzed. The validity of this analysis is not predicated upon a specific switch design, therefore, this proposed amendment will not create the possibility of a new or different kind of accident than previously analyzed.

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

An evaluation of the new switch design was performed and it was concluded that no unreviewed safety questions were involved. The intent of the Technical Specifications is not altered in that restrictions on how and when the vacuum breakers may be cycled are unchanged. Therefore, the proposed amendment does not involve a significant reduction in the margin of safety.

The Commission provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR Part 50, Section 50.92 by providing examples of amendments that are considered not likely to involve significant hazards considerations. The changes to the Monticello Operating License proposed in this amendment request are similar to NRC example (i). This example addresses changes to the Technical Specifications made to achieve consistency, correct errors in nomenclature, or for similar administrative reasons. It is inconsistent for the Technical specifications to identify a specific switch design when there in no technical reason to limit the design. Including such details in the Technical Specifications imposes unnecessary restrictions on equipment modifications or replacements. As previously noted, the switch design does not significantly affect any plant safety analysis, nor does it result in a significant change in safety function or a significant reduction in any safety margin.

Based on this guidance and for the reasons discussed above, we have concluded that the proposed changes do not involve a significant hazards consideration.

2. Diesel Fuel Oil Storage Tank Minimum Level

Section	Proposed Change
3.9.B.3.c	Revise this paragraph to read as follows: "For the diesel generators to be considered operable, there shall be a minimum of 34,500 gallons of diesel fuel (7 days supply for 1 diesel generator at full load @ 2500 KW) in the diesel oil storage tank."
3.9 (Bases)	Revise the fifth paragraph on page 204 to read as follows: "The minimum diesel fuel supply of 34,500 gallons will supply one diesel generator for a minimum of seven days of full load (2500 KW) operation. Actual fuel consumption during this period would be 33,096 gallons, but the minimum tank level has been established at the higher 34,500 gallon value to allow for instrument inaccuracy, tank volume uncertainties, and the location of the suction piping within the tank. Additional diesel fuel can normally be obtained within a few hours. Maintaining at least 7 days supply is therefore conservative."

Reason for Change:

During the recent Electrical Distribution System Functional Inspection conducted at Monticello, it was identified that a potentially non-conservative assumption had been used in the Standby Diesel Generator fuel oil usage calculation. The most conservative specific gravity, or API number, had not been used, which could result in slightly revised fuel consumption. The new minimum level proposed, 34,500 gallons, reflects the use of the most conservative specific gravity.

Determination of Significant Hazards Considerations:

This proposed change to the Operating License has been evaluated to determine if 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:

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

The increase in the minimum level of the Diesel Fuel Oil Storage Tank in no way increases the probability of an accident and provides additional assurance that the Standby Diesel Generators will operate as long as necessary to mitigate the consequences of any accident that may occur.

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

The proposed change involves no modification of plant equipment or Emergency Procedures and therefore introduces no new accident scenarios.

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

The proposed change will improve the margin of safety by increasing the minimum inventory of fuel oil on hand to supply the Standby Diesel Generators.

The Commission provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR Part 50, Section 50.92 by providing examples of amendments that are considered not likely to involve significant hazards considerations. The changes to the Monticello Operating License proposed in this amendment request are similar to NRC example (ii), which addresses changes that constitute an additional limitation, restriction, or control. This example applies because the proposed change represents a more conservative and restrictive control on minimum fuel level in the Diesel Fuel Oil Storage Tank.

Based on this guidance and for 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. Therefore, this amendment will not result in any significant environmental impact.