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SUBJECT: Discusses NRC concerns w/license renewal activities. License renewal application will be completed & kept in updated form. Util will support NRC senior mgt review of license renewal issues directly or through NUMARC.

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December 11, 1992

Dr. Thomas Murley
Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

License Renewal Activities

Thank you for your time on our telephone conversation yesterday afternoon. I understand your concern with the recent communications among NSP, the NRC Staff, and the Commissioners regarding license renewal. We thought the information that we were providing was being disseminated to all levels of the NRC Staff. It is apparent we erred in not contacting senior staff management directly. Regarding the decision and the timing of the announcement which placed the Monticello License Renewal Application on hold, this was done in a very short time frame. This short time did not allow us time to make multiple contacts within your organization. Our NRC Staff contacts for license renewal activities were notified as soon the decision was finalized and we were allowed to inform people outside of NSP. To ensure that you and Mr. Taylor, the Executive Director for Operations, have a clear understanding of where NSP stands with regard to our license renewal activities we are pleased you have agreed to meet with me and other NSP personnel on Tuesday, December 22 at 11 a.m. We look forward to a meaningful discussion on Monticello's current status, our concerns with the license renewal regulatory process, and our future interactions.

I would also like to add, that we are encouraged by the briefings which you and others provided to the Commissioners on December 7 and 8 on the important subject of license renewal. We are pleased at the active role NRC Senior Management is planning to take in the license renewal arena. NSP would like to offer its support to you and your efforts either by directly sharing our experiences as a lead plant or through your contacts with the Nuclear Management and Resources Council (NUMARC).

On December 18, another briefing to the Commissioners is scheduled to address the topic of industry initiatives for license renewal. The Office of Nuclear Reactor Regulation is scheduled to present information regarding Lead Plant Activities. Previous commitments will prevent NSP from presenting our current plans for 1993, to the Commissioners as part of those briefings. In order to ensure that the Office of Nuclear Reactor Regulation is well informed and understands our current status, as well as the activities we would like to undertake with the NRC Staff in 1993, I have described them below.

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Dir of NRR
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Submittal of the Monticello License Renewal Application is on hold. The four factors affecting this decision are: 1) high level waste disposal concerns; 2) low level waste disposal concerns; 3) reducing operations and maintenance costs while maintaining excellent operations; and 4) uncertainties with the regulatory processes governing license renewal.

The Monticello License Renewal Application will be completed and kept in an updated form. The NSP team working on the license renewal activities will be kept intact. They will be used to complete and update the application, as well as continuing our interfaces with the industry and the NRC as we continue to develop the regulatory process. As I indicated above, we will support the NRC senior management review of license renewal issues either directly or through NUMARC. We would also like to take the opportunity in 1993 to interface with the NRC Staff on our application. We would like to request support for a series meetings on a bi-monthly frequency. We would propose a format whereby the NRC Staff would come to Monticello for three days each meeting. The first one to two days would be spent by the NRC staff reviewing application sections, technical support documents, and other supporting documentation, such as plant procedures. Upon completion of an agreed upon set of application sections, NSP and the NRC staff would spend the following day providing feedback and exchanging ideas for ways to improve the process. We believe this type of review would benefit the NRC staff, NSP and the industry by providing significant insights to the license renewal process while Monticello's application is on hold. It will also shorten the review period should NSP decide to submit its application.

Again, we look forward to our meeting on December 22, and discussing the issues which affect license renewal. If you or your staff have any questions on the information contained in this letter or specific topics which you would like us to address on December 22, please do not hesitate to contact me or Terry Pickens (612) 295-1041.

Sincerely,



Leon R. Eliason
Vice President
Nuclear Generation

c: Executive Director for Operations, NRC
Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
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