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 RECIP. NAME: RECIPIENT AFFILIATION:
 Office of Nuclear Reactor Regulation, Director

SUBJECT: Expresses concern re 820430 completion date for mods re Mark 1 containment long-term program. Request to amend completion date may be necessary.

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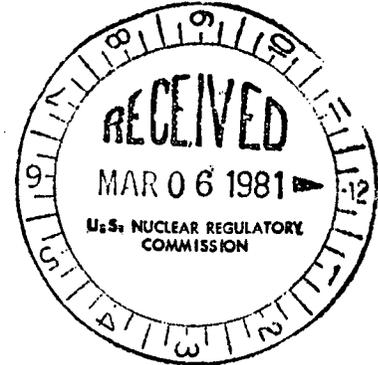
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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

February 27, 1981

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

Commission's Order for Modification of License and Grant of Extension
of Exemption for Completion of Mark I Containment Long Term Program

In an Order for Modification of License and Grant of Extension of Exemption dated January 13, 1981, the Monticello License was amended to require completion of all modifications related to the Mark I Containment Long Term Program by April 30, 1982. The purpose of this letter is to express our concern over this completion date and notify the Commission that a request to amend the completion date may be required.

The April 30, 1982 completion date was based on our letter of May 15, 1979. Many of the assumptions which led to our original schedule have changed in the twenty months since the April, 1982 date was reported. While we are still working toward meeting the original completion schedule, it has become apparent that the April, 1982 date may not be met. There are two reasons for this:

- a. The load definition for assessment of downcomer lateral load is not yet available.
- b. Assessment of torus attached piping is not completed and the extent of required modifications is not known. These modifications could range from trivial to complex.

The engineering effort to date has been directed toward resolution of the major Mark I Program Modifications. Resolution of these relatively minor concerns has been deferred. Each of these concerns has, however, the potential to significantly extend the existing schedule for completion of the Mark I Long Term Program. This is especially true if any required modification requires a plant outage.

Mark I Long Term Program modifications at Monticello have been progressing in a logical and efficient fashion for the last several years. Monticello has been in the forefront of this work. We believe that the establishment of a fixed completion deadline, based on a schedule supplied twenty months ago, is detrimental to this logical and efficient process. This is especially true in light of other Commission mandated completion dates for TMI Action Plan Items, fire protection, qualification of equipment, and scram discharge volume modification.

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NORTHERN STATES POWER COMPANY

Director NRR
February 27, 1981
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In summary, we ask that the Commission consider up-to-date information from licensees when establishing modification completion dates. We also ask that Orders for completion of plant modifications be issued with due consideration given to existing Commission mandated schedules for completion of other requirements.



L O Mayer, PE
Manager of Nuclear Support Services

LOM/DMM/bd

Attachment

cc: J G Keppler
G Charnoff
NRC Resident Inspector