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 MAYER, L.O. Northern States Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests extension of schedule until 820401 for submitting plans, schedules & descriptions of fire protection mods, per 10CFR50, App R, Section II, G.#. Analysis of associated circuits especially time consuming. Affidavit encl.

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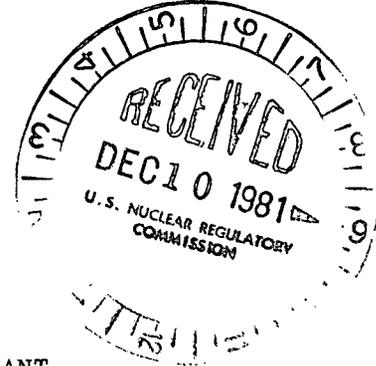


Northern States Power Company

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December 3, 1981

Director
Office of Nuclear Reactor Regulation
Attn: Document Control Desk
U S Nuclear Regulatory Commission
Washington, DC 20555



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

Request for Relief from the Requirements of 10 CFR Part 50,
Sections 50.48 (c)(5), Dates for Submitting Plans, Schedules, and
Descriptions of Appendix R Fire Protection Modification

On March 13, 1981 Northern States Power Company submitted a request for extension of the schedule specified in Section 50.48(c)(2), (c)(3), and (c)(5) of 10 CFR Part 50 for meeting the requirements of Section III.G of Appendix R. Specifically, we requested:

- (1) that the date in paragraph (c)(5) for submitting plans and schedules for meeting the provisions of paragraphs (c)(2), (c)(3), and (c)(4) with respect to the requirements of Section III.G of Appendix R, and for submitting design descriptions of modifications needed to satisfy Section III.G.3 of Appendix R, be extended from March 19, 1981, to December 19, 1981;
- (2) that the implementation date in paragraph (c)(2) for installation of modifications required by Appendix R, Section III.G.2, that do not require prior NRC approval or plant shutdown, be extended from nine months after February 17, 1981, to nine months after November 17, 1981.
- (3) that the implementation date in paragraph (c)(3) for the installation of modifications required by Appendix R, Section III.G.2, that do not require prior NRC approval, but require plant shutdown, be extended from before startup after the first refueling or extended outage commencing 180 days or more after February 17, 1981, to before startup after the first refueling or extended outage commencing 180 days or more after November 17, 1981.

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The purpose of this request is to obtain additional time for submitting plans and schedules for meeting the provisions of paragraphs (c)(2), (c)(3), and (c)(5) with respect to the requirements of Section III.G of Appendix R and for submitting design descriptions of modifications needed to satisfy Section III.G.3 of Appendix R (which need prior NRC approval). In our March 13, 1981 request we asked that the date for submitting this material be extended from March 19, 1981 to December 19, 1981. We now ask that this date be extended to April 1, 1982.

As stated in our March 13, 1981 request the reassessment of the Monticello plant to determine compliance with Section III.G of Appendix R is a monumental task. The General Electric Company and Bechtel Power Corporation are performing this work under the direction of the NSP Nuclear Technical Services Group at Monticello. Analysis of associated circuits has proven to be especially time consuming. Original estimates of the time required for this portion of the reassessment were found to be grossly in error.

Reassessment of the plant has been divided into three phases:

1. Identification of safe shutdown circuits
2. Identification of circuits "associated" with safe shutdown circuits
3. Application of Appendix R, Section III.G, criteria and design of modification or justification for exemption where criteria not met

Phase one has been completed by General Electric. However, they fell behind our original schedule by five weeks because more manual labor was required than planned. All safe shutdown equipment elementary wiring drawings were reviewed and marked up (approximately 900 circuits) in phase one.

Bechtel is beginning phase two activities. Computer sorts of cable routing are straightforward. Many manhours will be required, however, in determining points of associated circuit "cross over". Walkdowns based on the computer sorts will require additional manhours. An unforeseen problem related to sleeve penetrations is an unknown factor at this time. The original plant routing program did not identify wall sleeve penetrations. Routing through sleeves must be manually verified in every case. An increase of 90% in the original manhour estimate has been requested by General Electric for completing phase two.

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The additional extension requested will not be detrimental to public health and safety. As stated in our March 13, 1981 letter, the original plant design plus modifications and procedural changes specified in the Fire Protection Safety Evaluation issued in 1979 by the NRC staff provide a high degree of assurance that the plant can be safely shutdown in the event of any fire. A trained fire brigade of five individuals is available at all times for responding to a fire. The plant is provided with an extensive array of fire detectors, up-to-date fire fighting equipment, and automatic fire suppression systems in many plant areas.

Our March 13, 1981 letter also requested an extension in the implementation dates specified in Section 50.48(c)(2) and (c)(3) for modifications required by Appendix R, Section III.G. For modifications not requiring plant shutdown or prior NRC approval we requested an extension until August 17, 1982. For modifications that require a plant shutdown, but no prior NRC approval, we requested an extension until the first refueling or extended outage commencing after May 16, 1982. It is now clear that extensions in these dates will also be needed. Although the exact nature of the required modifications will not be known until our reassessment of the plant is completed, it is obvious that the implementation date extensions requested in our March 13, 1981 letter will not be adequate. Additional relief in the implementation schedule will be justified in conjunction with our April 1, 1982 submittal of plans, schedules, and design descriptions. We also expect to request a number of exemptions from the requirements of Appendix R, Section III.G, in those cases where compliance with Section III.G would be impractical or degrade the overall safety of the plant, and where a suitable alternative providing equivalent protection against fire exists or can be installed.

Accordingly, we are at this time requesting the foregoing extensions of the schedule requirements specified in paragraphs 50.48(c)(5). Please contact us if you have any questions related to this request or if we can furnish additional information related to this issue.



L O Mayer, PE
Manager of Nuclear Support Services

LOM/DMM/bd

cc: Secretary of the Commission (original and 2 copies)
Director, IE-III, NRC
NRR Project Manager, NRC
Resident Inspector, NRC
G Charnoff

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED DECEMBER 3, 1981
REQUEST FOR RELIEF FROM REQUIREMENTS OF 10 CFR PART 50,
SECTIONS 50.48 (c)(5), DATES FOR SUBMITTING PLANS, SCHEDULES,
AND DESCRIPTIONS OF APPENDIX R FIRE PROTECTION MODIFICATIONS

Northern States Power Company, a Minnesota corporation, by this letter dated December 3, 1981 hereby submits a request for relief from the requirements of 10 CFR Part 50, Sections 50.48 (c)(5).

This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By

L. O. Mayer
L O Mayer

Manager of Nuclear Support Services

On this 3rd day of December, 1981, before me a notary public in and for said County, personally appeared L O Mayer, Manager of 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.

Betty J. Dean

