



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

February 15, 1982

Director
Office of Nuclear Reactor Regulation
Attn: Secretary of the Commission
Docketing and Service Section
U S Nuclear Regulatory Commission
Washington, DC 20555



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

Request for Relief from the Requirements of 10 CFR Part 50,
Sections 50.48 (c)(2), (c)(3), and (c)(5), Schedule for
Completion of Appendix R Fire Protection Modifications

On December 3, 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. As a result of recent progress meetings with both contractors involved in the analysis, the plant's Nuclear Technical Services group has determined the schedule requested in our December 3, 1981 letter cannot be met.

With reference to the schedule discussed in our December 3, 1981 letter, Bechtel Power Corporation has proceeded far enough in their Phase II work to allow General Electric to begin Phase III of our analysis; application of Appendix R, Section III.G criteria and design of needed modifications. However, Bechtel has requested a 200% increase over their original manhour estimate to complete their work and likewise General Electric has asked for a 300% increase. This is considerably more than the manhour increases the contractors estimated they would need when we prepared our December 3, 1981 extension request. Concurrently, the Monticello Nuclear Technical Services group is providing further guidance to contractor personnel based on knowledge gained in recent NRC discussions with the Nuclear Utility Fire Protection Group. Accordingly, we are seeking extensions of our previous commitments as follows:

- (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 December 19, 1981, to July 1, 1982;
- (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 November 17, 1981, to nine months after June 1, 1982.

*AOOB
S/10*

NORTHERN STATES POWER COMPANY


Director, NRR
February 15, 1982
Page -2-

- (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 November 17, 1981, to before startup after the first refueling or extended outage commencing 180 days
✓ or more after June 1, 1982.

As stated in our December 3, 1981 letter, the requested extension will not be detrimental to public health and safety. The original plant design plus modifications and procedural changes specified in the original Fire Protection Safety Evaluation provide a high degree of assurance that the plant can be safely shutdown in the event of a fire.

It is hoped that current discussions between NRC staff and the Nuclear Utility Fire Protection Group will produce clear guidance on methods for demonstrating compliance with Section III.G criteria. It is our intention to provide a thorough and auditable document which will show the process by which we plan to arrive at conformance with Appendix R.

Please contact us if you have any questions concerning this request for relief from schedule requirements or if we can furnish additional information related to this issue.



L O Mayer, PE
Manager of Nuclear Support Services

LOM/KNC/jh

cc Director, NRR, NRC
Regional Administrator-III, NRC
NRR Project Manager, NRC
Resident Inspector, NRC
G Charnoff

Attachment

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED FEBRUARY 15, 1982
REQUEST FOR RELIEF FROM REQUIREMENTS
OF 10 CFR PART 50, SECTIONS 50.48 (c)(2), (c)(3), and (c)(5)

Northern States Power Company, a Minnesota corporation, by this letter dated February, 1982 hereby submits a request for relief from the requirements of 10 CFR Part 50, Sections 50.48 (c)(2), (c)(3), and (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 15th day of February, 1982, 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.

Jeanne M Hacker

