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 Office of Nuclear Reactor Regulation, Director

SUBJECT: Provides addl info re conformance to Rev 2 to Reg Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant & Environs Conditions During & Following Accident," per DB Vassallo 850211 request.

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Director
Office of Nuclear Reactor Regulation
U S Nuclear Regulator Commission
Washington, DC 20555

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

Additional Information Related to Conformance
With Regulatory Guide 1.97, Revision 2

The purpose of this letter is to provide additional information related to conformance to Regulatory Guide 1.97, Revision 2, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident." This information was requested in a letter dated February 11, 1985 from Domenic B. Vassallo, Chief, Operating Reactors Branch, #2, Division of Licensing, USNRC.

The following information is provided in response to Mr. Vassallo's letter:

1. Neutron flux--the licensee's present instrumentation is acceptable on an interim basis, until Category 1 instrumentation is developed and installed (Section 3.3.1).

Response: We will follow and evaluate industry development of improved neutron flux instrumentation. No commitment for the type or installation date of new equipment can be made at this time.

2. Drywell atmosphere temperature--the licensee should upgrade the drywell atmosphere temperature instrumentation to Category 2 (Section 3.3.8).

Response: After reviewing drafts of our plant specific emergency operating procedures currently being developed, we agree that it is appropriate to upgrade the drywell atmosphere temperature instrumentation to Category 2. Upgraded equipment will be installed during the 1987 refueling outage.

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3. RCIC flow--environmental qualification needs to be addressed in accordance with 10 CFR 50.49 (Section 3.3.9).

Response: RCIC flow indication was evaluated for LOCA and High Energy Line Break (HELB) events as part of our response to the environmental qualification rule 10 CFR 50.49. It was concluded that this indication does not have to be qualified for a harsh environment in accordance with the rule.

4. Standby liquid control system (SLCS) storage tank level--environmental qualification should be addressed in accordance with 10 CFR 50.49 (Section 3.3.11).

Response: SLCS flow indication was evaluated in our response to 10 CFR 50.49, and it was concluded that this indication does not have to be qualified for harsh environments.

5. RHR heat exchanger outlet temperature--the licensee should upgrade this instrumentation to Category 2 criteria (Section 3.3.12).

Response: Our procedures do not require the control room operator to monitor RHR heat exchanger outlet temperature during design basis accident events. The various modes of the RHR system are used to control reactor vessel level, drywell pressure and temperature, and the suppression pool temperature. The responses of these parameters are used to monitor the effectiveness of RHR operation. We therefore feel that implementation of RHR heat exchanger outlet temperature as a Category 3 variable is acceptable.

6. Cooling water temperature to ESF system components--the licensee should supply Category 2 instrumentation for the emergency service water system (Section 3.3.13).

Response: EG&G has made an incorrect assumption regarding the emergency service water system; it is not cooled by heat exchangers. The emergency service water system uses raw water from the intake structure just as the normal service water system does. There is no temperature control over this water; therefore we feel that Category 3 implementation of this variable is acceptable.

We would like to point out a disparity between the computer table and the notes section pertaining to this variable in our December 30, 1983 submittal. The computer table shows the temperature monitoring provided for the RHR Service Water (RHRSW) System which was not discussed under Note 18. The RHRSW system also takes raw water suction from the intake structure. When operated, the system flow is automatically controlled to maintain proper differential pressure on the RHR heat exchangers by a Category 2 dP controller. It is not operated in a

temperature control mode, therefore we feel that Category 3 temperature indication for this system is adequate also.

7. Cooling water to ESF system components--the licensee should supply Category 2 flow instrumentation for this variable (Section 3.3.13).

Response: Again, as noted in item 6 above, the instrumentation associated with the RHRSW system was not discussed in Note 18. RHRSW flow indication is provided in the control room. The flow instrumentation is located in a mild environment for design basis accident events, therefore Category 3 implementation for this flow indication is considered acceptable.

Flow monitoring will be added to the emergency service water headers. Flow instrumentation installed on the headers to the diesel generators will be implemented as Category 3 since they will be located in a mild environment accessible during design basis accidents. Flow instrumentation for the emergency service water headers in the reactor building will be implemented as Category 2. These modifications will be implemented during the 1987 refuel outage.

Please contact us if you have any questions related to the additional information we have provided.


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