Northern States Power Company

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

October 2, 1985

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

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

Supplement No. 2 to License Amendment
Request Dated April 3, 1984

In our letter of August 30, 1985 we provided additional information related to the revised control room habitability study submitted for the Monticello Nuclear Generating Plant on August 17, 1984. During a telephone conference call with the NRC Staff on September 5, 1985 we were asked to respond to two questions. The purpose of this letter is to provide the requested responses.

a. What is the basis for the 0.06 air change/hour assumed in the analysis for infiltration? The infiltration value used should be based on a 1/8 inwc d/p.

The Monticello control room is contained entirely with the administration building. No walls are exposed to the outside air and wind. No thermal column effects or significant barometric pressure effects are expected. On sensing toxic gas, the ventilation system is isolated. The suggestion in Regulatory Guide 1.78 to use a 1/8 inwc d/p to evaluate infiltration does not appear to be applicable in this case.

The 0.06 air changes/hour assumption was based on Table C-2 of Regulatory Guide 1.78 using the value specified for a Type B control room.

Except for chlorine, the analyses submitted on August 30, 1985 are not sensitive to the assumption for infiltration since they assume normal ventilation remains in use (no automatic isolation) until gas is detected by the control room operators.

In the case of chlorine, Bechtel has determined that relatively high infiltration rates can be acceptable. See the attached letter from C B Hogg, Bechtel Power Corporation, to M Vik, NSP, dated September 26, 1985.

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b. Credit is taken for a chlorine monitor actuation delay of 15 seconds in the analysis. What is the basis for this assumption?

As noted in the attached letter, the assumed delay time takes credit for a ten second monitor delay and a five second damper closing time. We believe these assumptions are very conservative.

Because of this conservatism, we believe a Technical Specification on monitor response time is not needed. Chlorine monitor response time Technical Specifications are not required by NUREG-0123, Revision 3. Such testing would appear to be very difficult, in practice, to accomplish on a regular basis.

Further review of your request for additional information regarding emergency procedures (Item 3 of our letter dated August 30, 1985) may not have provided the information requested (i.e., important provisions of our emergency procedures were not identified). It is, therefore, requested that our response to Item 3 be withdrawn, in its entirety, and replaced with the following:

3. Regulatory Positions C.13 and C.15 of Regulatory Guide 1.78 have been reviewed. As a result of this review the following important provisions have been identified which should be contained in emergency procedures for coping with toxic gas release accidents:

   a. Criteria for donning protective breathing apparatus and isolating the control room.

   b. Parameters to be considered in determining the need for plant shutdown.

   c. Guidelines for evacuation of non-essential personnel and procedures to accomplish evacuation.

   d. Criteria for emergency classification of toxic gas release accidents.

   e. Identification of most probable chemical release.

   f. Concentration levels detectable by smell and medical consequences at various concentration levels.

   g. Description of detection instrumentation including initiation levels and resulting automatic action.

   h. Instructions covering the use and locations of protective breathing apparatus.

The ammonia, hydrogen sulfide and hydrogen chloride toxic chemical monitors will not be removed until the above provisions have been incorporated. We will notify you when these procedure revisions have been completed.

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

for Monica Vik
David Musolf
Manager - Nuclear Support Services

c: Regional Administrator-III, NRC
Resident Inspector, NRC
NRR Project Manager, NRC
G Charnoff

Attachment

Attachment
Director of NRR
October 2, 1985

Bechtel Power Corporation

Engineers — Constructors

12440 East Imperial Highway
Norwalk, California 90650

MAIL ADDRESS
P.O. BOX 60860 · TERMINAL ANNEX, LOS ANGELES CALIFORNIA 90060
TELEPHONE (213) 817-2000

September 26, 1985

In reply please reference:
BLM: 3062
DC: 27827

Ms. M. Vik
Engineer II
Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

Subject: Bechtel Job 10040-237
Northern States Power Company
Monticello Nuclear Generating Plant
Additional Information on Monticello
Toxic Chemical Analysis

Dear Ms. Vik:

Transmitted per your request is additional information which you can use in your response to the NRC.

The 0.06 air charges per hour was assumed based upon Table C-2 in Regulatory Guide 1.78 for a type B control room. However, Bechtel has performed a chlorine release accident analysis which showed that up to 1 air change per hour is still acceptable within the context of Nureg-0570.

The 15 seconds monitor actuation delay time actually takes credit for a 10 second monitor delay and a 5 second damper closing time.

If additional information is required, please call.

Very truly yours,

for

C. B. Hogg
Project Engineering Manager

CBH:HVS/cjk