

NOVEMBER 16 1978

Docket No. 50-263

Mr. L. O. Mayer, Manager
Northern States Power Company
414 Nicollet Mall - 8th Floor
Minneapolis, Minnesota 55401

Dear Mr. Mayer:

Your submittal of March 15, 1978, relating to the proposed Inservice Inspection and Testing Program for the Monticello Nuclear Generating Plant, is being reviewed by our staff. In order to complete our review, you are requested to provide within 45 days of receipt of this letter, the additional information identified in the enclosure.

Sincerely,

Original signed by

Thomas A. Ippolito, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Enclosure:
Request for Additional
Information

cc: see next page

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App3
ccp

OFFICE	ORB#1	ORB#3				
SURNAME	RBevan:acr	Tippolito				
DATE	11/15/78	11/15/78				

Northern States Power Company

cc

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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

The Engineering Branch, Division of Operating Reactors, has reviewed the proposed inservice inspection and testing program for all safety related components in the Monticello Nuclear Generating Plant for compliance with 10 CFR Part 50.55a(g).

The following additional information is required at present to properly evaluate the proposed program.

INSERVICE INSPECTION PROGRAM

1. Request for Relief 18 - Provide additional information, including sketches or drawings, to demonstrate that the penetrations do not see reactor pressure. Explain how the seal leakage is monitored. Justify why the insulation surrounding the nozzles can't be removed. Has replacement been considered with removable insulation?

2. Request for Relief 24

Provide information to demonstrate that the proposed procedure is capable of detecting the expected discontinuities (qualification testing results).

3. Request for Relief 29

Your program is required to be performed to ASME Section XI, 1974 Edition including Addenda through Summer 1975. If each of the particular aspects of pressure testing discussed in the basis of this relief request constitutes a hardship, please state the reason why it is impractical and the basis for relief. Institution of later Code editions on a piece meal basis for convenience is not acceptable.

4. Request for Relief 30

Provide a list of the non-isolable junctions. Identify the hardship with each particular case, and provide specific information on why the test pressure must be reduced and details of the proposed alternative testing.

5. Request for Relief 32

Provide your basis for the classification of the containment vessel as an ASME Class 2 component.

6. Request for Relief 17

What is the time duration (hold time) of the pressure test?

7. Request for Relief 23

Can the permanent insulation be removed from the class 2 and not replaced without degrading system performance? Provide an estimate of the total man-rem exposure associated with each component support examination within containment.

PUMP TESTING PROGRAM

1. Request for Relief 2

You request exemption from measuring bearing temperature on RHR, RCIC, HPCI, core spray, standby liquid control, emergency service water and RHR service water pumps.

Why is it not practical to install instrumentation? Can portable instrumentation be used? Can alternate testing be performed? Why are external temperature measurements not considered an indication of pump performance?

2. Request for Relief 3

You request the use of vibration velocity as opposed to vibration amplitude measurements. How will vibration velocity measurements be evaluated? What will be the alert and required action ranges?

3. Request for Relief 27

You request exemption from measuring flow rate of the Emergency servicewater pumps on the basis that no instrumentation is installed..

Can portable instrumentation be used? Why is it impractical to install instrumentation?

Valve Testing Program

1. Page 4-5: (Valve leak rate testing)

Leak rate testing according to 10 CFR 50 Appendix J does not replace Section XI IWV 3420 requirements. Our position on leak testing Category A valves is:

- . Those valves that perform both a pressure isolation and a containment isolation function must satisfy both Appendix J and Section XI requirements.
- . Those valves that perform pressure isolation only shall meet Section XI requirements.
- . Those valves that perform containment isolation only shall meet Appendix J requirements.

2. Provide justification for not testing valve RBCC-15 during cold shutdown with test connections proposed per letter, "Planned modifications to Permit Testing to be conducted in Accordance with 10 CFR 50, Appendix J."
3. Page 4-9, will the functional testing frequency for these check valves conform to frequency required by IWV-3520?
4. Page 4-10, why is it impractical to install instrumentation on the feedwater check valves to permit testing to code requirements?
5. On page 4-12, you reference valves H0-7 and RCIC-7, as operating too fast for a meaningful stroke time measurement. The intent of IWV-3400 is to measure the change or deterioration of valve stem movement. What criteria will be used to determine proper valve operation? Why can't a limiting time be established?
6. Page 4-13, What is the safety related function of SW-17?
7. Page 4-16, full stroke testing of valves is intended to mean stroking the valve to the position required to fulfill its function. If valves are functionally tested at the frequency required by IWV-3410, no request for relief is necessary.
8. Page 4-33, since the owner specifies stroke time of the valve, explain why IWV-3410 is not based on system functional requirements and valve variability. Alternate testing is acceptable only if it can be shown equivalent to IWV-3410.

9. Do any of the valves on instrument lines that penetrate containment receive a containment isolation signal? Why aren't instrument line containment isolation valves tests indicated in the ISI program?
10. Concerning the main steam system, what is the safety related function of the following valves? Why aren't they categorized? XDV-2, XDV-3, MS-13-1, MS-22-1, RV-1242, MO-2564, MO-1846, MO-1617, MO-1045.
11. Concerning the reactor recirculation system, what is the safety related function of the following valves? Why aren't they categorized? XDV-4, XR-6-1, XR-5-2.
12. Concerning the RHR system, what is the safety related function of the following valves? Why aren't they categorized?

MO-1987	RHR-7	RHR-4-1
MO-1986	MO-2407	RHR-5-1
CV-2024	MO-2032	RHR-4-2
RHR-9		RHR-5-2
13. Concerning the HPCI system, what is the safety related function of the following valves? Why aren't they categorized?

MO-2061	HPCI-60	ST-2052
HPCI-65	HPCI-7	HPCI-27
HPCI-71	HPCI-12	HPCI-13
HPCI-70	HPCI-24	HPCI-16
14. Concerning the RCIC system, what is the safety related function of MO-2402? Why isn't it categorized?
15. Concerning the standby liquid control system what is the safety related function of XP-24-2 and XP-15? Why aren't they categorized?
16. Concerning the RHR-service water system, what is the safety related function of RHR-SW-8-2, RHR-SW-8-2? Why aren't they categorized?
17. Concerning the CRD system, what is the safety related function of 101, 102, 112, 113? Why aren't they categorized?
18. Concerning the core spray system, what is the safety related function of MO-1741, MO-1742, MO-1749, MO-1750, CS-10-1, CS-10-2? Why aren't they categorized?