



Monticello Nuclear Generating Plant  
2807 W County Road 75  
Monticello, MN 55362

March 30, 2012

L-MT-12-030  
10 CFR 2.202

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Monticello Nuclear Generating Plant  
Docket No. 50-263  
Renewed License No. DPR-22

Answer to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

On March 12, 2012, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued an immediately effective order in the captioned matter entitled “Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Effective Immediately)” (“Order”) to, *inter alia*, Monticello Nuclear Generating Plant (ADAMs Accession No. ML12054A736). Specifically with respect to this Order, the NRC determined that additional requirements must be imposed to mitigate beyond-design-basis external events. These additional requirements impose guidance and strategies to be available if the loss of power, motive force and normal access to the ultimate heat sink to prevent fuel damage in the reactor and spent fuel pool affected all units at a site simultaneously. Specific requirements are outlined in Attachment 2 to the Order.

The Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this order in August 2012. Finally, the order requires full implementation of its requirements no later than two refueling cycles following the submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

Pursuant to 10 CFR § 2.202 and the terms specified in the Order, Monticello Nuclear Generating Plant (MNGP) hereby submits its answer to the Order. MNGP consents to the Order and does not request a hearing. Based on information currently available, MNGP has not identified any circumstances of the type described in Sections IV.B.1

and IV.B.2 of the Order requiring relief at this time. In addition, MNGP has not identified any impediments to compliance with the Order within two refueling cycles following the submittal of the overall integrated plan, or by December 31, 2016, whichever is earlier. MNGP will provide further responses as required by Section IV.C in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of MNGP to comply with the specific compliance deadline dates based on the probable availability of that guidance, MNGP's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.


If there are any questions or if additional information is needed, please contact Ms. Jennie Eckholt, Licensing Engineer, at 612-330-5788.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

 3/30/12

Timothy J. O'Connor  
Site Vice President, Monticello Nuclear Generating Plant  
Northern States Power Company - Minnesota

cc: Administrator, Region III, USNRC  
Director of Nuclear Reactor Regulation (NRR), USNRC  
NRR Project Manager, MNGP, USNRC  
Senior Resident Inspector, MNGP, USNRC