



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

March 30, 2012

L-MT-12-029
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
Reliable Hardened Containment Vents (Order Number EA-12-050)

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 Reliable Hardened Containment Vents (Effective Immediately)" ("Order") to, *inter alia*, Monticello Nuclear Generating Plant (ADAMS Accession No. ML12054A694). Specifically with respect to this Order, the NRC has decided that BWRs with Mark I and Mark II containments shall have a reliable hardened vent to remove decay heat and maintain control of containment pressure within acceptable limits following events that result in the loss of active containment heat removal capability or prolonged Station Blackout (SBO). Specific requirements for reliable hardened vents 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.

The Order also states that the Commission also intends to decide, after receipt of a Policy Paper from the NRC staff, whether to also require installation of filtration systems on these hardened vent systems (Order at Section II, p. 5). The Policy Paper is scheduled to be delivered by July 2012. The full extent of work necessary to implement this Order cannot be known until after Commission action after review of the staff's July 2012 Policy Paper.

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 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