

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

January 4, 2013

L-MT-12-102 10 CFR 50.90

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

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

License Amendment Request: Adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month"

Pursuant to 10 CFR 50.90, Northern States Power Company – Minnesota (NSPM), doing business as Xcel Energy, Inc., proposes to revise Monticello Nuclear Generating Plant (MNGP) Technical Specifications (TS), Specifications 3.6.4.3, "Standby Gas Treatment (SGT) System," 3.7.4, "Control Room Emergency Filtration (CREF) System," and also 5.5.6, "Ventilation Filter Testing Program (VFTP)". The proposed amendment would modify TS requirements to operate ventilation systems with charcoal filters from 10 hours each month to 15 minutes in accordance with TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month." The availability of this TS improvement was announced in the Federal Register (FR) published on September 20, 2012 [77 FR 58421] as part of the Consolidated Line Item Improvement Process (CLIIP).

Enclosure 1 provides a description of the proposed changes and includes the technical evaluation and associated no significant hazards determination and environmental evaluation. Enclosure 2 provides a marked-up copy of the existing TS pages showing the proposed changes. Enclosure 3 provides a marked-up copy of the TS Bases pages showing the proposed changes. The proposed Bases changes are provided for information only.

NSPM requests approval of this proposed license amendment request by January 15, 2014, with the amendment being implemented within 120 days of NRC approval.

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In accordance with 10 CFR 50.91(a)(1), the analysis about the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is being provided to the Commission.

The MNGP Plant Operations Review Committee has reviewed this application. In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated Minnesota Official.

This license amendment request has been evaluated and has no impact on the pending Extended Power Uprate and Maximum Extended Load Line Limit Analysis Plus (MELLLA+) license amendment requests currently under NRC review.

Should you have questions regarding this letter, please contact Mr. Richard Loeffler at (763) 295-1247.

Summary of Commitments

This letter proposes no new commitments and does not revise any existing commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January $\underline{4}$, 2013.

John C. Grubb Plant Manager, Monticello Nuclear Generating Plant Northern States Power Company - Minnesota

Enclosures (3)

cc: Administrator, Region III, USNRC Project Manager, Monticello, USNRC Resident Inspector, Monticello, USNRC Minnesota Department of Commerce ENCLOSURE 1

MONTICELLO NUCLEAR GENERATING PLANT

LICENSE AMENDMENT REQUEST

ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-522, REVISION 0, "REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH"

DESCRIPTION OF CHANGES

(8 pages follow)

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DESCRIPTION OF CHANGES

ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-522, REVISION 0, "REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH"

1.0 DESCRIPTION

Pursuant to 10 CFR 50.90, Northern States Power Company – Minnesota (NSPM), doing business as Xcel Energy, Inc., proposes to revise Monticello Nuclear Generating Plant (MNGP) Technical Specification (TS) for Specifications 3.6.4.3, "Standby Gas Treatment (SGT) System," 3.7.4, "Control Room Emergency Filtration (CREF) System," and 5.5.6, "Ventilation Filter Testing Program (VFTP)."

The proposed change revises the Surveillance Requirements (SRs) which currently require testing of SGT and CREF Systems, with the heaters operating, for a continuous 10 hour period every 31 days without the heaters operating. The associated SRs are proposed to be revised to require operation of these systems for 15 continuous minutes every 31 days. Additionally, it is proposed to remove Specification 5.5.6, Item e, under the VFTP, concerning operation of the SGT and CREF Systems heaters, for the reasons described herein.

The proposed amendment is consistent with TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month" (Reference 1).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

The availability of this TS improvement was announced in the Federal Register published on September 20, 2012 [77 FR 58421] (Reference 2) as part of the Consolidated Line Item Improvement Process (CLIIP).

NSPM has reviewed the model safety evaluation dated September 13, 2012 as part of the Federal Register Notice of Availability. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-522. As described in the subsequent paragraphs, NSPM has concluded that the justifications presented in the TSTF-522 proposal and the model safety evaluation prepared by the NRC staff are applicable to MNGP and justify this amendment for the incorporation of the changes to the MNGP TS under the CLIIP.

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2.2 Optional Changes and Variations

MNGP is proposing the following variations from the TS changes described in the TSTF-522, Revision 0, or the applicable parts of the NRC staff's model safety evaluation (SE), dated September 13, 2012.

The Regulatory Evaluation section of the model SE states, "Plants that test ventilation system adsorption at a relative humidity [RH] of 95 percent do not require heaters for the ventilation system to perform its specified safety function". MNGP Specification 5.5.6, "Ventilation Filter Testing Program (VFTP)," Item c, requires laboratory testing of the SGT and CREF Systems charcoal adsorber samples at a RH of 95 percent in accordance with ASTM D3803-1989. Specification 5.5.6, VFTP, Item e, however, is now an unnecessary requirement to demonstrate that the SGT and CREF Systems heaters dissipate a specified wattage, even though they are tested at a RH of 95 percent.

MNGP proposes an additional variation to TSTF-522, Revision 0, to remove Specification 5.5.6, Item e, concerning operation of the heaters since this SR is no longer required for operability of the SGT and CREF Systems. This proposed change is consistent with TSTF-522, since the improved standard TS (NUREG-1433) on which this Traveler is based, contains both options with or without humidity control (i.e., electric heaters) as bracketed version of the SR. Removal of this SR (Specification 5.5.6, Item e, is for the same reasons as provided in the TSTF-522, and authorized in the model SE. The necessary changes to the MNGP VFTP are provided in Enclosure 2.

MNGP TS utilizes a different title for TS 3.7.4, Control Room Emergency Filtration (CREF) System," than the BWR/4 Standard Technical Specifications (STS) on which TSTF-522, Revision 0 was based. The difference is an administrative variation and does not affect the applicability of TSTF-522 to the MNGP TS.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

In accordance with the requirements of 10 CFR 50.90, Northern States Power Company – Minnesota (NSPM), doing business as Xcel Energy, Inc., requests an amendment to facility Renewed Operating License DPR-22, for the Monticello Nuclear Generating Plant (MNGP). NSPM proposes to revise MNGP Technical Specification (TS) Specifications 3.6.4.3, "Standby Gas Treatment (SGT) System," 3.7.4, "Control Room Emergency Filtration (CREF) System," and 5.5.6, "Ventilation Filter Testing Program (VFTP)".

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The proposed change revises the Surveillance Requirements (SRs) which currently require testing of SGT and CREF systems, with the heaters operating, for a continuous 10 hour period every 31 days. The SRs are revised to require operation of the systems for 15 continuous minutes every 31 days without the heaters operating and removal of Specification 5.5.6, Item e, since this specification is no longer required.

As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change replaces existing SRs to operate the SGT System and CREF System equipped with electric heaters for a continuous 10 hour period every 31 days with a requirement to operate the systems for 15 continuous minutes (without the heaters operating) and removes a no longer required SR under the VFTP.

These systems are not accident initiators and therefore, these changes do not involve a significant increase in the probability of an accident. The proposed system and filter testing changes are consistent with current regulatory guidance for these systems and will continue to assure that these systems perform their design function which may include mitigating accidents. Thus the changes do not involve a significant increase in the consequences of an accident.

Therefore, it is concluded that these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change replaces existing SRs to operate the SGT System and CREF System equipped with electric heaters for a continuous 10 hour period every 31 days with a requirement to operate the systems for 15 continuous minutes (without the heaters operating) and removes a no longer required SR under the VFTP.

The change proposed for these ventilation systems does not change any system operations or maintenance activities. Testing requirements will be revised and will continue to demonstrate that the Limiting Conditions for Operation (LCO) are met and the system components are capable of performing their intended safety functions. The changes do not create new failure modes or mechanisms and no new accident precursors are generated.

Therefore, it is concluded that these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change replaces existing SRs to operate the SGT System and CREF System equipped with electric heaters for a continuous 10 hour period every 31 days, with a requirement to operate the systems for 15 continuous minutes without the heaters operating and removes a no longer required SR under the VFTP. Testing requirements will be revised and will continue to demonstrate that the LCOs are met and the system components are capable of performing their intended safety functions.

The proposed changes are consistent with regulatory guidance. Therefore, it is concluded that these changes do not involve a significant reduction in a margin of safety.

Based on the above, NSPM concludes that the proposed changes presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

3.2 Applicable Regulatory Requirements

Title 10 of the Code of Federal Regulations, Paragraph 50.36, requires Technical Specifications to contain Surveillances. It states, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met." The proposed change revise surveillance requirements and the revised SRs continues to demonstrate that the necessary quality of the SGT System and CREF System is maintained. Therefore, the proposed changes are in compliance with 50.36.

The TSTF-522, Rev. 0 Traveler and model Safety Evaluation discuss the applicable regulatory requirements and guidance, including the 10 CFR 50, Appendix A, General Design Criteria (GDC). MNGP was designed largely before the publishing of the 70 GDC for Nuclear Power Plant Construction Permits proposed by the Atomic Energy Commission (AEC) for public comment in July 1967, and constructed prior to the 1971 publication of the 10 CFR 50, Appendix A, GDC. As such, MNGP was not licensed to the Appendix A, GDC.

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The MNGP USAR, Section 1.2, lists the Principal Design Criteria (PDC) for the design, construction and operation of the plant. MNGP USAR Appendix E provides a plant comparative evaluation to the 70 proposed AEC design criteria. It was concluded that the plant conforms to the intent of the GDC. The applicable GDC and PDC associated with the operation of the ventilation systems are discussed below.

• PDC 1.2.1 – General Criteria

- b. The plant is designed in such a way that the release of radioactive materials to the environment is limited, so that the limits and guideline values of published regulations pertaining to the release of radioactive materials are not exceeded.
- PDC 1.2.4 Plant Containment
 - e. The integrity of the complete plant containment system and such other associated engineered safeguards as may be necessary are designed and maintained so that offsite and Control Room operator doses resulting from postulated design basis accidents are below the values stated in 10 CFR 50.67.

The applicable 70 Draft AEC General Design Criteria (AEC-GDC) are:

Criterion 11 - Control Room (Category B)

The facility shall be provided with a control room from which action to maintain safe operational status of the plant can be controlled. Adequate radiation protection shall be provided to permit access, even under accident conditions, to equipment in the control room or other areas as necessary to shut down and maintain safe control to the facility without radiation exposures of personnel in excess of 10CFR20 limits. It shall be possible to shut the reactor down and maintain it in a safe condition if access to the control room is lost due to fire or other causes.

Criterion 17 - Monitoring Radioactivity Releases (Category B)

Means shall be provided for monitoring the containment atmosphere, the facility effluent discharge paths, and the facility environs, for radioactivity that could be released from normal operations, from anticipated transients, and from accident conditions.

<u>Criterion 62 - Inspection of Air Cleanup Systems (Category A)</u>

Design provisions shall be made to facilitate physical inspection of all critical parts of containment air cleanup systems such as ducts, filters, fans, and dampers.

<u>Criterion 63 - Testing of Air Cleanup Components (Category A)</u>

Design provisions shall be made so that active components of the air cleanup systems, such as fans, dampers, can be tested periodically for operability and required functional performance.

<u>Criterion 64 - Testing of Air Cleanup Systems (Category A)</u>

A capability shall be provided for insitu periodic testing and surveillance of the air cleanup systems to ensure (a) filter bypass paths have not developed, and (b) filter and trapping materials have not deteriorated beyond acceptable limits.

<u>Criterion 65 - Testing of Operational Sequence Air Cleanup Systems</u> (Category A)

A capability shall be provided to test under conditions close to design as practical the full operational sequence that would bring the air cleanup systems to action, including the transfer to alternate power sources and the design air flow delivery capability.

As discussed in the model Safety Evaluation for TSTF-522, Revision 0, the regulatory requirements for design and testing of the SGT and CREF systems are contained in 10 CFR 50.67, 10 CFR 100, as well as GDC 19, 41, 42, 43 and 61. Regulatory Guide 1.52, Revision 3, "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants" (Reference 3), provides updated guidance and criteria acceptable to the NRC staff to implement the regulations in 10 CFR related to the SGT and CREF systems.

NSPM has evaluated the proposed changes against the applicable regulatory requirements and acceptance criteria. The technical analysis concludes that the proposed TS changes will continue to assure that the design requirements and acceptance criteria for MNGP are met. Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

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4.0 ENVIRONMENTAL EVALUATION

The proposed changes would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed changes.

5.0 REFERENCES

- NRC approved Revision 0 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF- 522, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month".
- Federal Register Notice published on September 20, 2012 [77 FR 58421], NRC Notice of Availability for "Model Safety Evaluation For Plant-Specific Adoption of Technical Specification Task Force Traveler TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month," Using the Consolidated Line Item Improvement Process".
- 3. NRC Regulatory Guide 1.52, Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants, Revision 3, issued June 2001".

ENCLOSURE 2

MONTICELLO NUCLEAR GENERATING PLANT

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LICENSE AMENDMENT REQUEST

ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-522, REVISION 0, "REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH"

MARKED-UP TECHNICAL SPECIFICATION PAGES

(6 pages follow)

ACTIONS (continued)

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CONDITION		REQUIRED ACTION	COMPLETION TIME		
	C.2.2	Initiate action to suspend OPDRVs.	Immediately		
 D. Two SGT subsystems inoperable in MODE 1, 2, or 3. 	D.1	Enter LCO 3.0.3.	Immediately		
E. Two SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs.	E.1	Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately		
	E.2	Initiate action to suspend OPDRVs.	Immediately		
SURVEILLANCE REQUIREME	SURVEILLANCE REQUIREMENTS				
minutes. SU	RVEILL	ANCE	FREQUENCY		
SR 3.6.4.3.1 Operate each SGT subsystem for \geq 10 continuous hours with heaters operating. 31 days					
SR 3.6.4.3.2Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).In accordance with the VFTP			In accordance with the VFTP		
SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual 24 months or simulated initiation signal.			24 months		

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME	
F. Two CREF subsystems inoperable during movement of recently	NOTE LCO 3.0.3 is not applicable.		
irradiated fuel assemblies in the secondary containment or during OPDRVs.	F.1 Suspend movement of recently irradiated fuel assemblies in the secondary containment	Immediately	
OR	secondary containment.		
One or more CREE	AND		
subsystems inoperable due to an inoperable CRE boundary during movement of recently irradiated fuel assemblies in the secondary containment or during OPDRVs.	F.2 Initiate action to suspend OPDRVs.	Immediately	

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		15	
SURVEILLANCE F	REQUIREMENTS]
minutes.	SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Operate each CREF subsystem for \geq 40 hours with the heaters operating.	∲) continuol	us 31 days
SR 3.7.4.2	Perform required CREF filter testing in a with the Ventilation Filter Testing Progra	accordance am (VFTP)	e In accordance . with the VFTP
SR 3.7.4.3	Verify each CREF subsystem actuates of or simulated initiation signal.	on an actu	al 24 months
SR 3.7.4.4	Perform required CRE unfiltered air in-le testing in accordance with the Control R Envelope Habitability Program.	eakage coom	In accordance with the Control Room Envelope Habitability Program

5.5.5 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves.

a. Testing Frequencies specified in the ASME Operation and Maintenance (OM) Code and applicable Addenda as follows:

ASME OM Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Biquarterly	At least once per 46 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly, every 12 months, or annually	At least once per 366 days
Biennially, every 24 months, or every 2 years	At least once per 731 days
Every 48 months	At least once per 1461 days
Every 5 years	At least once per 1827 days
Every 8 years	At least once per 2922 days
Every 10 years	At least once per 3653 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities.
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities.
- d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.
- 5.5.6 Ventilation Filter Testing Program (VFTP)
 - A program shall establish the required testing of Engineered Safety Feature (ESF) filter ventilation systems. Tests described in Specifications 5.5.6.a and 5.5.6.b shall be performed once per 24 months and following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the high efficiency particulate air (HEPA) filters or charcoal adsorber capability.

No Changes for Information

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5.5.6 <u>Ventilation Filter Testing Program (VFTP)</u> (continued)

The test described in Specification 5.5.6.a shall be performed after any maintenance or testing that could affect the leak tight integrity of the HEPA filters.

The test described in Specification 5.5.6.b shall be performed after any maintenance or testing that could affect the leak tight integrity of the charcoal adsorber banks.

Tests described in Specification 5.5.6.c shall be performed once per 24 months; at least once per 720 hours of system operation; following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the charcoal adsorber capability.

The tests described in Specification 5.5.6.d shall be performed once per 92 days for the Standby Gas Treatment (SGT) System and once per 24 months for the Control Room Emergency Filtration (CREF) System.

The test described in Specification 5.5.6.e shall be performed once per 24 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1989 at the system flowrate specified below.

each pair of HEPA filters

Replace with:	ESF Ventilation System	Penetration (%)	Flowrate (cfm)
(Deleted)	SGT System	≤ 1.0	\geq 3,150 and \leq 3,850
	CREF System	\leq 1.0 for each individual HEPA filter and \leq 0.05 for	\geq 900 and \leq 1,100

Removed

sentence

longer

since it is no

applicable.

5.5.6 <u>Ventilation Filter Testing Program (VFTP)</u> (continued)

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1989 at the system flowrate specified below.

ESF Ventilation System	Penetration (%)	Flowrate (cfm)
SGT System	≤ 1 .0	\geq 3,150 and \leq 3,850
CREF System	\leq 1.0 for each individual charcoal adsorber section and \leq 0.05 for each pair of charcoal adsorber sections	≥ 900 and ≤ 1,100

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and the relative humidity specified below.

ESF Ventilation System	Penetration (%)	<u>RH (%)</u>	
SGT System	≤ 5 .0	95	
CREF System	<u><</u> 0.5	95	

d. Demonstrate for each of the ESF systems that the pressure drop across the combined filters is as specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1989 at the system flowrate specified below.

ESF Ventilation System	<u>Delta P (inches water</u> <u>gauge)</u>	Flowrate (cfm)
SGT System	≤ 6	\geq 3,150 and \leq 3,850
CREF System	≤ 8	\geq 900 and \leq 1,100
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5.5.6 <u>Ventilation Filter Testing Program (VFTP)</u> (continued)

e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below when tested in accordance with ANSI N510-1989.

Remove Specification 5.5.6.e from the TS	<u>ESF Ventilation</u> <u>System</u>	<u>Nominal Wattage (kW)</u>
	SGT System	<u>≥ 18</u>
	CREF-System	\geq 4.5 and \leq 5.5

5.5.7 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Offgas Treatment System, the quantity of radioactivity contained in gas storage tanks or fed into the Offgas Treatment System, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks. The quantity of radioactivity after 12 hours holdup contained in each gas storage tank shall be $\leq 22,000$ Ci of noble gases (considered as dose equivalent Xe-133). The quantity of liquid radioactive waste contained in each unprotected outdoor liquid storage tank shall be ≤ 10 Ci, excluding tritium and dissolved or entrained noble gases.

The program shall include:

- The limits for concentrations of hydrogen and oxygen in the Offgas Treatment System and a Surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion);
- A Surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank and fed into the Offgas Treatment System is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents; and
- c. A Surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System is less than the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

ENCLOSURE 3

MONTICELLO NUCLEAR GENERATING PLANT

LICENSE AMENDMENT REQUEST

ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-522, REVISION 0, "REVISE VENTILATION SYSTEM SURVEILLANCE REQUIREMENTS TO OPERATE FOR 10 HOURS PER MONTH"

MARKED-UP TECHNICAL SPECIFICATION BASES PAGES

(3 pages follow)

BASES

ACTIONS (continued)

The Required Actions of Condition C have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving recently irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of recently irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

<u>D.1</u>

If both SGTS subsystems are inoperable in MODE 1, 2, or 3, the SGT system may not be capable of supporting the required radioactivity release control function. Therefore, actions are required to enter LCO 3.0.3 immediately.

E.1 and E.2

When two SGT subsystems are inoperable, if applicable, movement of recently irradiated fuel assemblies in secondary containment must immediately be suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must immediately be initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

Required Action E.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving recently irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of recently irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE REQUIREMENTS	<u>SR 3.6.4.3.1</u>	15	minutes
	Operating each SGT subsystem for ≥ 4 both subsystems are OPERABLE and t functioning properly. It also ensures th excessive vibration can be detected for	θ continuous hou that all associated at blockage, fan c	rs ensures that d controls are or motor failure, or

excessive vibration can be detected for corrective action. Operation with the heaters on (automatic heater cycling to maintain temperature) for ≥ 10 continuous hours every 31 days eliminates moisture on the

BASES

SURVEILLANCE REQUIREMENTS (continued)

adsorbers and HEPA filters. The 31 day Frequency was developed in consideration of the known reliability of fan motors and controls and the redundancy available in the system.

SR 3.6.4.3.2

This SR verifies that the required SGT filter testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

<u>SR 3.6.4.3.3</u>

This SR verifies that each SGT subsystem starts on receipt of an actual or simulated initiation signal. While this Surveillance can be performed with the reactor at power, operating experience has shown that these components usually pass the Surveillance when performed at the 24 month Frequency. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.6.2, "Secondary Containment Isolation Instrumentation," overlaps this SR to provide complete testing of the safety function. Therefore, the Frequency was found to be acceptable from a reliability standpoint.

REFERENCES	1.	USAR, Section 1.2.4.e.
	2.	USAR, Section 5.3.4.1.
	3.	USAR, Section 14.7.2.
	4.	USAR, Section 14.7.6.

SURVEILLANCE REQUIREMENTS

Operation for ≥ 15

OPERABILITY of

Periodic operation

demonstrates

the system.

ensures that blockage, fan or

motor failure, or

excessive vibration

can be detected for

corrective action.

continuous minutes

<u>SR 3.7.4.1</u>

This SR verifies that a subsystem in a standby mode starts on demand from the control room and continues to operate. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every month provides an adequate check on this system. Monthly heater operation dries out any moisture that has accumulated in the charcoal as a result of humidity in the ambient air. Systems with heaters must be operated for ≥ 10 continuous hours with the heaters energized. Furthermore, the 31 day Frequency is based on the known reliability of the equipment and the two subsystem redundancy available.

SR 3.7.4.2

This SR verifies that the required CREF testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, minimum system flow rate, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP.

<u>SR 3.7.4.3</u>

This SR verifies that on an actual or simulated initiation signal, each CREF subsystem starts and operates. The LOGIC SYSTEM FUNCTIONAL TEST in LCO 3.3.7.1, "Control Room Emergency Filtration (CREF) Instrumentation," overlaps this SR to provide complete testing of the safety function. Operating experience has shown that these components usually pass the Surveillance when performed at the 24 month Frequency. Therefore, the Frequency is acceptable from a reliability standpoint.

<u>SR 3.7.4.4</u>

This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air in-leakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.