



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

May 23, 2013

Mr. Mark A. Schimmel  
Site Vice President  
Monticello Nuclear Generating Plant  
Northern States Power Company – Minnesota  
2807 West County Road 75  
Monticello, MN 55362-9637

**SUBJECT: PLAN FOR THE REGULATORY AUDIT REGARDING FLOODING  
WALKDOWNS TO SUPPORT IMPLEMENTATION OF NEAR-TERM TASK  
FORCE RECOMMENDATION 2.3 RELATED TO THE FUKUSHIMA DAI-ICHI  
NUCLEAR POWER PLANT ACCIDENT – MONTICELLO NUCLEAR  
GENERATING PLANT, UNIT 1 (TAC NO. MF0248)**

Dear Mr. Schimmel:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a request for information letter per Title 10 of the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter). The 50.54(f) letter was issued to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. The request addressed the methods and procedures for plants to conduct seismic and flooding hazard walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program, and to verify the adequacy of the monitoring and maintenance procedures.

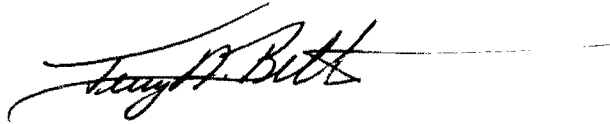
By letter dated November 27, 2012, and supplemented by letter dated March 29, 2013, Northern States Power Company – Minnesota submitted a Flooding Walkdown Report as requested per Enclosure 4, "Recommendation 2.3: Flooding," of the 50.54(f) letter for Monticello Nuclear Generating Plant (MNGP), Unit 1. The NRC staff plans to conduct a regulatory audit to gain a better understanding of the methods and procedures used by MNGP to conduct the flooding walkdowns and facilitate NRC staff review of the walkdown report. The audit will be conducted at MNGP from July 30 - August 2, 2013, in accordance with the enclosed regulatory audit plan.

M. Schimmel

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If you have any questions, please contact me by telephone at 301-415-3049 or by e-mail at [Terry.Beltz@nrc.gov](mailto:Terry.Beltz@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Terry A. Beltz", followed by a horizontal line.

Terry A. Beltz, Senior Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosure:  
As stated

cc w/encl: Distribution via Listserv



## **Audit Plan**

### **Flooding Walkdown Review for the Monticello Nuclear Generating Plant, Unit 1**

**Audit Date: July 30 – August 2, 2013**

**Japan Lessons Learned Project Directorate  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission**

Enclosure

## **Audit Plan**

### **Monticello Nuclear Generating Plant, Unit 1**

#### **1. Background**

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a request for information letter<sup>1</sup> per Title 10 to the *Code of Federal Regulations*, Subpart 50.54(f) (50.54(f) letter). The 50.54(f) letter was issued to power reactor licensees and holders of construction permits requesting addressees to provide further information to support the NRC staff's evaluation of regulatory actions to be taken in response to lessons learned from Japan's March 11, 2011, Great Tōhoku Earthquake and subsequent tsunami. The request addressed the methods and procedures for plants to conduct seismic and flooding hazard walkdowns to identify and address degraded, nonconforming, or unanalyzed conditions through the corrective action program, and to verify the adequacy of the monitoring and maintenance procedures.

By letter dated November 27, 2012, and supplemented by letter dated March 29, 2013,<sup>2</sup> Northern States Power Company – Minnesota submitted a Flooding Walkdown Report as requested per Enclosure 4, "Recommendation 2.3: Flooding," of the 50.54(f) letter for the Monticello Nuclear Generating Plant (MNGP), Unit 1.

#### **2. Regulatory Audit Bases**

The NRC staff intends to conduct a regulatory audit to gain a better understanding of the methods and associated procedures used by Northern States Power Company – Minnesota to conduct the flooding walkdowns at MNGP and facilitate NRC staff review of the walkdown report.

Guidance for performing the flooding walkdowns was developed by the Nuclear Energy Institute (NEI) with extensive review and input from NRC staff in numerous public meetings, webinars, and public conference calls during its development. NEI submitted NEI 12-07, "Guidelines for Performing Verification Walkdowns of Plant Flood Protection Features" (walkdown guidance)<sup>3</sup> for endorsement, and the staff subsequently endorsed the walkdown guidance by letter dated May 31, 2012.<sup>4</sup> By letter dated Jun 11, 2012,<sup>5</sup> Northern States Power Company - Minnesota indicated that they would utilize the NRC-endorsed guidance in the performance of the walkdowns at MNGP.

The 50.54(f) letter and the walkdown guidance are used as the basis documents upon which this regulatory audit is to be performed.

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<sup>1</sup> The 50.54(f) letter is available in the Agencywide Document Access and Management System (ADAMS) under Accession No. ML12053A340.

<sup>2</sup> The walkdown report and supplement are available under ADAMS Accession Nos. ML12333A348 and ML13092A055, respectively.

<sup>3</sup> NEI 12-07 is available ADAMS under Accession No. ML12144A401.

<sup>4</sup> The NRC endorsement of NEI 12-07 is available in ADAMS under Accession No. ML12144A142.

<sup>5</sup> The licensee's letter is available in ADAMS under Accession No. ML12164A436.

### **3. Regulatory Audit Scope**

The scope of this regulatory audit for MNGP is to examine relevant flooding walkdown documents, interview flooding walkdown participants, observe areas of the plant walked down, and examine other relevant materials used to conduct the flooding walkdowns. This will assist the staff in identifying whether the flood walkdowns were conducted in accordance with the walkdown guidance and the 50.54(f) letter. The NRC staff will request additional information using the appropriate regulatory process.

The staff reviewed the walkdown report for MNGP and compared it with the requested information in the 50.54(f) letter and the walkdown guidance. The factors that the NRC staff considered in choosing sites to audit were:

- Lack of clarity as to how the walkdown was consistent with the guidance based on the review of the walkdown report.
- Plant-specific areas of interest identified during review of the walkdown report
- Feedback and information gained during performance of regional inspections (e.g., Temporary Instruction 2515/187).

### **4. Information Needs**

The licensee is requested to have the following documentation available on site for the audit team. The documentation could be provided electronically or by paper copies. If provided electronically, the licensee is requested to have at least three computers available for the audit team, with a printer attached.

- All walkdown record forms (as described in Appendix B of NEI 12-07).
- Supplemental guidelines or procedures used, in addition to NEI 12-07, for the implementation of the flooding walkdowns, including industry, fleet, or site-specific guidelines or procedures.
- Flood-specific procedures that are part of flood protection and mitigation strategy and hazardous weather response that were reviewed as part of the flood walkdowns, including, but not limited to, MNGP Procedure A.6 "Acts of Nature."
- Listing of entries into the corrective action program resulting from the performance of the flood walkdowns, including condition report number, title, and brief summary of the issue or observation and its disposition.
- Documentation of the tabletop simulation of the construction of the ringwall levee and floodwall system, including, but not limited to, any engineering analyses that were used as part of the tabletop simulation for the construction of the ring levee and floodwall system.

Additional information needs identified during the audit will be communicated to the designated point of contact.

The NRC staff also requests the licensee to make personnel who performed the walkdowns (including site staff and contractors) accessible upon request (either in person or by phone). The personnel should be able to answer questions about how the visual inspections and reasonable simulations were performed, how available physical margin (APM) values were determined, and discuss engineering analyses that were developed in support of the walkdown.

#### **5. Team Assignments**

<b>Area of Review</b>	<b>Assigned Auditor</b>
Team Lead	Stephen Campbell (NRC)
Flooding Walkdown Technical Lead	Peter Chaput (NRC)
Flooding Technical Support	Joseph Kanney (NRC)
Flooding Technical Support	Christopher Cook (NRC)
Technical Support	Patricia Voss (NRC)
Flooding Technical Support	Steve Breithaupt (PNNL)

#### **6. Logistics**

The audit will be conducted at MNGP from July 30 - August 2, 2013. Entrance and exit briefings will be held at the beginning and end of this audit, respectively. The licensee is requested to provide a room for the use of the audit team. A more detailed proposed audit schedule is attached.

#### **7. Deliverables**

An audit report/summary will be issued to the licensee within about 90 days from the end of the audit. Additionally, the results of the audit will be utilized to focus the scope of any requests for additional information issued in the course of this review.

**Monticello Nuclear Generating Plant Unit 1  
Flooding Walkdown Audit Schedule  
July 30 – August 2, 2013**

**July 30, 2013**

A.M.

- **8:30 a.m. Check-in at site** – receive badges, meet licensee contact(s), and setup for entrance meeting.
- **9:30 a.m. Entrance Meeting** - introductions, audit activities and goals, and audit logistics.
- **10:30 a.m. NRC Team Breakout** – staff review of procedures, basis documents and reports related to licensees conduct of flooding walkdown.

P.M.

- **1:00 p.m. Discussion with the licensee on flooding walkdown methodology**
- **3:30 p.m. Audit Team Caucus**
- **5:00 p.m. NRC / Licensee Interim Meeting**
- **6:00 p.m. Audit Team Daily Closeout**

**July 31, 2013**

A.M.

- **8:00 a.m. NRC Team Breakout** – staff review of procedures, basis documents and reports related to licensees conduct of flooding walkdown.
- **10:00 a.m. Plant walkdown** - (as reasonably accessible and in accordance with “As Low As Reasonably Achievable (ALARA) exposure policies).

P.M.

- **1:30 p.m. Discussion(s) with MNGP flooding walkdown team members and contractors**
- **4:00 p.m. Audit Team Caucus**
- **5:00 p.m. NRC / Licensee Interim Meeting**
- **6:00 p.m. Audit Team Daily Closeout**

**August 1, 2013**

A.M.

- **8:00 a.m. NRC Team Breakout** – staff review of procedures, basis documents and reports related to licensees conduct of flooding walkdown.
- **10:00 a.m. Plant walkdown** - (as reasonably accessible and in accordance with ALARA).

P.M.

- **1:30 p.m. Discussion(s) with MNGP flooding walkdown team members and contractors**
- **4:00 p.m. Audit Team Caucus**
- **5:00 p.m. NRC / Licensee Interim Meeting**
- **6:00 p.m. Audit Team Daily Closeout**

**August 2, 2013**

A.M.

- **8:00 a.m. NRC/Licensee Exit Meeting**



M. Schimmel

- 2 -

If you have any questions, please contact me by telephone at 301-415-3049 or by e-mail at [Terry.Beltz@nrc.gov](mailto:Terry.Beltz@nrc.gov).

Sincerely,

**/RA/**

Terry A. Beltz, Senior Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosure:  
As stated

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**DISTRIBUTION:**

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ADAMS Accession No: **ML13127A163**

OFFICE	DORL/LPL3-1/PM	DORL/LPL3-1/LA	JLD/PMB/PM	DSEA/RHMB
NAME	TBeltz	SRohrer	GEMiller	PChaput*
DATE	05/10/13	05/13/13	05/21/13	05/09/13
OFFICE	DSEA/RHMB/BC	DORL/LPL3-1/BC	DIRS/IRIB	DORL/LPL3-1/PM
DATE	CCook*	RCarlson	SCampbell	TBeltz
NAME	05/22/13	05/21/13	05/21/13	05/23/13

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