



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

July 30, 2013

L-MT-13-068
10 CFR 50.73

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

LER 2013-003 "Inadequate External Flooding Procedure"

A Licensee Event Report (LER) for this occurrence is attached.

Summary of Commitments

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

A handwritten signature in black ink, appearing to read 'Mark A. Schimmel'.

Mark A. Schimmel
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power Company-Minnesota

Enclosure

cc: Regional Administrator, Region III, USNRC
Project Manager, Monticello Nuclear Generating Plant, USNRC
Resident Inspector, Monticello Nuclear Generating Plant, USNRC

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory information collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA/Privacy Section (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME Monticello Nuclear Generating Plant	2. DOCKET NUMBER 05000 - 263	3. PAGE 1 OF 3
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4. TITLE
Inadequate External Flooding Procedure

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
5	31	13	2013	003	00	7	30	2013	FACILITY NAME	DOCKET NUMBER

9. OPERATING MODE 4	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)															
	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
10. POWER LEVEL 0%	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A												

12. LICENSEE CONTACT FOR THIS LER

NAME Carrie Fosaaen, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) 763-295-1357
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

14. SUPPLEMENTAL REPORT EXPECTED <input checked="" type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE MONTH: 9, DAY: 30, YEAR: 2013
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

In preparation for the NRC's 10 CFR 50.54(f) flooding audit, an assessment of the external flooding walkdowns was performed at MNGP during the week of May 21, 2013. This effort resulted in the identification of external flooding weaknesses in the Procedure A.6, "Acts of Nature," for mitigation of a Probable Maximum Flood (PMF) event.

On May 31, 2013, an aggregate review of issues identified called into question the adequacy of Procedure A.6, "Acts of Nature," to protect the site from a Probable Maximum Flood. As a result, the MNGP submitted Event Notification 49085 for an unanalyzed condition.

The root cause is under investigation by the site. A supplement to this Licensee Event Report will be submitted following completion of the investigation and will outline corrective actions to address the root cause.

**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

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NARRATIVE

EVENT DESCRIPTION

Prior to discovery of the condition the Monticello Nuclear Generating Plant (MNGP) was in Mode 4 at 0% power.

In preparation for the NRC's 10 CFR 50.54(f) flooding audit, an assessment of the external flooding walkdowns was performed at MNGP during the week of May 21, 2013. This effort resulted in the identification of external flooding weaknesses in the Procedure A.6, "Acts of Nature," for mitigation of a Probable Maximum Flood (PMF) event. Examples of issues identified by the assessment team include:

- Procedure A.6 does not consider the Emergency Diesel Generator Emergency Service Water drains. A walkdown revealed that the drain is not visible in the expected location, and that it may be covered. As a result, it is not clear if this drain would allow flood waters to bypass the levee.
- Yard drains around the security access facility were not accounted for by the procedure. These would allow water to flow under the levee, if left unsealed during a PMF event.
- Construction drawings contained errors that would have created a gap between the intake structure and bin wall. Additionally, there were questions on bin wall construction once access is lost from the river side of the bin wall as there are interferences on the plant side of the bin wall that would complicate construction.

On May 31, 2013, an aggregate review of issues identified, such as the examples above, called into question the adequacy of Procedure A.6, "Acts of Nature," to protect the site from a Probable Maximum Flood. As a result, the MNGP submitted Event Notification 49085 for an unanalyzed condition.

EVENT ANALYSIS

This event is reportable in accordance with 10 CFR 50.73(a)(2)(ii) as an unanalyzed condition that significantly degraded plant safety. This condition is not considered a safety system functional failure.

SAFETY SIGNIFICANCE

The MNGP is required to be protected from flooding as described in the licensing basis. The procedural inadequacies could have affected the ability to protect the site during a PMF event. Since there has been no external flood approaching the PMF elevation, there were no adverse consequences to the health and safety of the public or the plant and its personnel as a result of the identified deficiencies.

Additional efforts are being conducted to determine the aggregate potential safety impact of the identified deficiencies and will be provided in the supplement to this Licensee Event Report.

CAUSE

The root cause is under investigation by the site. A supplement to this Licensee Event Report will be submitted following completion of the investigation and will outline the root cause.

**LICENSEE EVENT REPORT (LER)
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NARRATIVE

CORRECTIVE ACTION

Actions have been taken to address identified deficiencies. For example, Procedure A.6, "Acts of Nature," was revised to address the leakage pathways that were identified in the list above. Construction drawings for the bin wall were also updated to correct the gap identified.

The root cause is under investigation by the site. A supplement to this Licensee Event Report will be submitted following completion of the investigation and will outline corrective actions to address the root cause.

PREVIOUS SIMILAR EVENTS

On November 26, 1990 the site identified, in a Licensee Event Report (LER), that there were procedural inadequacies with the external flooding procedure related to protective measures for the Emergency Diesel Generator Fuel Oil Transfer House. The LER was supplemented April 24, 1991 with additional detail, including the cause of the event, which was procedural inadequacy. As a result, the external flooding procedure was revised to build a small levee around the Fuel Oil Transfer House. This action was recently deemed not reasonable because it would interfere with surrounding buildings and limit access to the Diesel Fuel Oil Storage Tank. The current protection method relies on an earthen levee that surrounds the site. The smaller levee around the Fuel Oil Transfer House is an optional back-up method of protection in the current revision of A.6, "Acts of Nature," and does not impact the ability to protect the Emergency Diesel Generator Fuel Oil Transfer House from a PMF.