



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

August 28, 2013

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

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

Monticello's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

References:

1. NRC Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ADAMS Accession No. ML12054A679).
2. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12221A339).
3. NEI 12-02, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" Revision 1, dated August 2012.
4. NSPM Letter to NRC, "Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated October 29, 2012 (ADAMS Accession No. ML12305A383).
5. NSPM Letter to NRC, "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013 (ADAMS Accession No. ML13060A447).

6. NSPM Letter to NRC, "Responses to Requests for Additional Information Regarding Monticello Nuclear Generating Plant's Overall Integrated Plan Submitted in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) (TAC No. MF0924)," dated July 12, 2013, (ADAMS Accession No. ML13193A324).

On March 12, 2012, the NRC staff issued Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," (Reference 1) to all NRC power reactor licensees and holders of construction permits in active or deferred status. Reference 1 was immediately effective and directs Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, to have a reliable indication of the water level in the spent fuel storage pool for Monticello Nuclear Generating Plant (MNGP). Specific requirements were outlined in Attachment 2 of Reference 1.

Pursuant to Condition C of Section IV, Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (ISG), an overall integrated plan, and status reports at six-month intervals following the submittal of the overall integrated plan. The ISG (Reference 2) endorsed, with exceptions and clarifications, the methodologies described in industry guidance document, NEI 12-02, "Industry Guidance for Compliance with Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,'" Revision 1 (Reference 3). Reference 4 provided the MNGP initial 60-day status report regarding reliable spent fuel pool instrumentation. Reference 5 provided the overall integrated plan for MNGP. Reference 6 provided the NSPM responses to NRC Requests for Additional Information (RAIs) regarding the overall integrated plan for MNGP.

The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2 of Reference 1, which delineates the progress made in implementing the requirements of the Reference 1 Order. The enclosed report provides an update of milestone accomplishments since the overall integrated plan was submitted, including changes to the compliance method, schedule, or the need and basis for relief, if any.

Please contact Lynne Gunderson, Licensing Engineer, at 612-396-0173, if additional information or clarification is required.

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

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

Executed on August 28, 2013.

A handwritten signature in black ink, appearing to read "Mark A. Schimmel". The signature is fluid and cursive, with a large loop at the end.

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

Enclosure

cc: Administrator, Region III, USNRC
Director of Nuclear Reactor Regulation (NRR), USNRC
Project Manager, Monticello Nuclear Generating Plant, USNRC
Resident Inspector, Monticello Nuclear Generating Plant, USNRC

ENCLOSURE

Monticello Nuclear Generating Plant First Six-Month Status Report for Implementation of Order EA-12-051, Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation

1.0 Introduction

The Nuclear Regulatory Commission (NRC) issued Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," on March 12, 2012 (Reference 1). The Order required licensees to have reliable indication of the water level in associated spent fuel pools capable of supporting identification of the following spent fuel pool water level conditions by trained personnel: (1) level that is adequate to support operation of the normal fuel pool cooling system, (2) level that is adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck, and (3) level where fuel remains covered and actions to implement make-up water addition should no longer be deferred. The Order required licensees to submit an overall integrated plan, including a description of how the requirements in Attachment 2 of the Order would be achieved. Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, submitted the overall integrated plan (Reference 2) for the Monticello Nuclear Generating Plant (MNGP) on February 28, 2013.

This Enclosure provides the MNGP first six-month status report. This status report includes an update of milestone accomplishments since submittal of the overall integrated plan including any changes to the compliance method, schedule, or the need and basis for relief, if any.

2.0 Milestone Accomplishments

The original milestone schedule, with target dates, was provided in Section 2.0 of Reference 2. The following milestone has been completed since the overall integrated plan was submitted and is current as of July 31, 2013.

- Select Instrument Vendor

3.0 Milestone Schedule Status

The following table provides an update of the milestone schedule to support the overall integrated plan. This includes a brief milestone status and a revised target date if the

date has changed. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	October 2012	Complete	
Submit Overall Integrated Plan	February 2013	Complete	
Select Instrument Vendor (Target date 1 st Quarter 2013)	March 2013	Complete	
Submit First Six-Month Status Update	August 2013	Complete with this submittal	
Commence Engineering Design	January 2014	Not Started	
Submit Second Six-Month Status Update	February 2014	Not Started	
Submit Third Six-Month Status Update (includes responses to Requests for Additional Information (RAIs))	August 2014	Not Started	
Commence Installation	September 2014	Not Started	
Submit Fourth Six-Month Status Update (includes responses to remaining RAIs)	February 2015	Not Started	
Reliable Spent Fuel Pool Instrumentation Operational	April 2015 (End of R27)	Not Started	
Submit Report that Full Compliance is Achieved	June 2015	Not Started	

No target completion dates for milestones have been changed. Responses to NRC Requests for Additional Information (RAIs) have been added to the third and fourth six-month status updates. Incorporation of the RAI responses into these status reports was discussed in Reference 3.

4.0 Proposed Changes to Compliance Method

There are no changes proposed to the compliance method described in the overall integrated plan (Reference 2).

5.0 Need and Basis for Relief from the Requirements of the Order

NSPM expects to comply with the Order implementation date and requirements and no relief is required at this time.

6.0 Open Items from Overall Integrated Plan and Draft Safety Evaluation

NSPM did not identify any open items in the overall integrated plan. The overall integrated plan did contain future actions to ensure compliance with the Order. The future actions were identified internally and are being tracked through NSPM's corrective action program (CAP).

No draft Safety Evaluation (SE) has been issued as of July 31, 2013. Closure of the draft SE open items, when issued, will be tracked to closure in future status reports. NSPM did receive RAIs (Reference 3) of which several responses were deferred to the third and fourth six-month status updates. The RAIs are listed below in the draft Safety Evaluation Open Item Table as the responses are seen as necessary for NRC to complete their review.

Draft Safety Evaluation Open Items		
Open Item Number	Description	Status
1	<p>RAI-1, Levels of Required Monitoring:</p> <p>b) Final mounting arrangement will be provided with the August 2014 six-month status report as part of response to RAI 3.</p> <p>c) Overall integrated plan, Section 3.3, Mounting, stated that an evaluation of other stored hardware will be conducted as part of the design process. The requested information will be provided with the August 2014, six-month status report.</p>	Not Started

2	<p>RAI-2, Arrangement:</p> <p>The planned locations for the primary and back-up level sensors, the mounting brackets and the proposed routing of the cables have not been determined. The final component locations will be available upon completion of the final design. The requested information will be provided with the August 2014, six-month status report.</p>	Not Started
3	<p>RAI-3, Mounting (all RAI subparts):</p> <p>The requested information will be provided with the August 2014, six-month status report.</p>	Not Started
4	<p>RAI-4, Qualification (all RAI subparts):</p> <p>The requested information will be provided with the August 2014, six-month status report.</p>	Not Started
5	<p>RAI-5, Independence (all RAI subparts):</p> <p>The requested information will be provided with the August 2014, six-month status report.</p>	Not Started
6	<p>RAI-6, Power Supplies (all RAI subparts):</p> <p>The requested information will be provided with the August 2014, six-month status report.</p>	Not Started
7	<p>RAI-7, Accuracy (all RAI subparts):</p> <p>Setpoints will be determined following Monticello procedure ESM-03.02, "Design Requirements, Practices & Topics (Instrumentation & Controls)." Determination of setpoints using this procedure is part of the NSPM design process. The requested information will be provided with the August 2014, six-month status report.</p>	Not Started
8	<p>RAI-8, Testing (all RAI subparts):</p> <p>The requested information will be provided with the August 2014, six-month status report.</p>	Not Started

9	RAI-9, Display (all RAI subparts): The requested information will be provided with the August 2014, six-month status report.	Not Started
10	RAI-10, Procedures: The requested information will be provided with the February 2015, six-month status report.	Not Started
11	RAI-11, Testing and Calibration (all RAI subparts): The requested information will be provided with the February 2015, six-month status report.	Not Started

7.0 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the draft Safety Evaluation identified at this time.

8.0 References

1. NRC Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012 (ADAMS Accession No. ML12054A679).
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