



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 Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ADAMS Accession No. ML12054A736).
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12229A174).
3. Nuclear Energy Institute (NEI) Guide, NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, 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 Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated October 29, 2012 (ADAMS Accession No. ML12305A420).

5. NSPM Letter to NRC, "Monticello Nuclear Generating Plant's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013 (ADAMS Accession No. ML13066A066).
6. NRC Order EA-12-050, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents," dated March 12, 2012 (ADAMS Accession No. ML12054A694).
7. NRC Order EA-13-109, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013 (ADAMS Accession No. ML13130A067).

On March 12, 2012, the NRC staff issued Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (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 (NSPM), a Minnesota corporation, doing business as Xcel Energy, to develop, implement and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event for the Monticello Nuclear Generating Plant (MNGP). Specific requirements are 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) endorses, with exceptions and clarifications, the industry guidance document, NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0 (Reference 3). Reference 4 provided the NSPM initial 60 day status report for MNGP regarding mitigation strategies. Reference 5 provided 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.

NRC Order EA-12-049 (Reference 1) requires implementation of Mitigation Strategies to address an extended loss of alternating current (AC) power (ELAP) and loss of normal access to ultimate heat sink (LUHS). The endorsed ISG for compliance with NRC Order

EA-12-049, ISG-JLD-2012-01 (Reference 2), used the containment vent required by NRC Order EA-12-050 (Reference 6) for the heat removal function for boiling water reactors (BWRs). Reference 5 provided the NSPM response for MNGP to the NRC Order EA-12-049 using the endorsed guidance from Reference 2. On June 6, 2013, the NRC rescinded NRC Order EA-12-050 with the issuance of NRC Order EA-13-109 (Reference 7). Thus, NSPM will not be installing an NRC Order EA-12-050 containment vent for MNGP as stated in Reference 5.

NSPM will be revising strategies to comply with the NRC Order EA-12-049 during 2013 with information from the industry, NEI, and NRC relative to the new requirements and schedule associated with NRC Order EA-13-109. This new strategy will follow NRC issuance of an ISG in October 2013. It is anticipated that the revised criteria and implementation schedule associated with the NRC Order EA-13-109 may impact containment venting procedures, training, and demonstrations related to the compliance date for NRC Order EA-12-049. NSPM will be in compliance with the aspects of the Reference 5 Mitigation Strategies that do not rely upon a Hardened Containment Vent System (HCVS) unless otherwise described. Any request for relief will be provided in a separate letter to the NRC and referenced in a future six-month status report. It is anticipated this will occur prior to the February 2014 six-month status report.

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

Summary of Commitments

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.



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

**Monticello Nuclear Generating Plant
First Six-Month Status Report for Implementation of Order EA-12-049,
Order Modifying Licenses with Regard to Requirements for
Mitigation Strategies for Beyond-Design-Basis External Events**

1.0 Introduction

The Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," on March 12, 2012 (Reference 1). The Order required licensees to develop, implement and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. 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 first six-month status report. This status report includes an update of milestone accomplishments since submittal of the overall integrated plan including 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 Attachment 2 of the Reference 2 Enclosure. No original milestones were scheduled for completion prior to this six-month status report. Therefore, NSPM has no milestone accomplishments to discuss.

3.0 Milestone Schedule Status

The following provides an update of the milestone schedule for the overall integrated plan. This includes a brief milestone status and a revised target date if the target date has changed. The target dates are planning dates subject to change as design and implementation details are developed.

- Validation Walk-throughs or Demonstrations:

A target completion date has been added to the milestone listing for completion of validation walk-throughs. The validation walk-throughs will be completed during the FLEX implementation outage.

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	
Submit First Six-Month Status Update	August 2013	Complete with this submittal	
Commence Engineering Modification Design – Phase 2 & 3	January 2014	Not Started	
Submit Second Six-Month Status Update	February 2014	Not Started	
Regional Response Center Operational	(TBD)	Started	
Procure Equipment	June 2014	Started	
Submit Third Six-Month Status Update	August 2014	Not Started	
Complete Installation for Online Modifications – Phase 2 and 3	August 2014	Not Started	
Implement Storage	December 2014	Not Started	
Issue Maintenance Procedures	December 2014	Started	
Implement Training	February 2015	Not Started	
Submit Fourth Six-Month Status Update	February 2015	Not Started	
Submit Staffing Assessment	Four months prior to R27	Not Started	
Complete Communication Recommendations	Four months prior to R27	Not Started	
Issue Procedures updated for FLEX strategies	April 2015	Not Started	
Implementation Outage	April 2015 (End of R27)	Not Started	
Validation Walk-throughs	April 2015	Not Started	
Submit Completion Report	August 2015	Not Started	

4.0 Proposed Changes to Compliance Method

There are no changes to the compliance method as documented in the overall integrated plan.

NRC Order EA-12-049 (Reference 1) requires implementation of Mitigation Strategies to address an extended loss of alternating current (AC) power (ELAP) and loss of normal access to ultimate heat sink (LUHS). The endorsed ISG for compliance with NRC Order EA-12-049, ISG-JLD-2012-01 (Reference 5), used the containment vent required by NRC Order EA-12-050 (Reference 6) for the heat removal function for boiling water reactors (BWRs). Reference 2 provided the NSPM response to the NRC Order EA-12-049 using the endorsed guidance from Reference 5. On June 6, 2013, the NRC rescinded NRC Order EA-12-050 with the issuance of NRC Order EA-13-109 (Reference 4). Thus, NSPM will not be installing an NRC Order EA-12-050 containment vent for MNGP as stated in Reference 2.

NSPM will be revising strategies to comply with the NRC Order EA-12-049 during 2013 with information from the industry, the Nuclear Energy Institute (NEI), and NRC relative to the new requirements and schedule associated with NRC Order EA-13-109. This new strategy will follow NRC issuance of an ISG in October 2013. It is anticipated that the revised criteria and implementation schedule associated with the NRC Order EA-13-109 may impact containment venting procedures, training, and demonstrations related to the compliance date for NRC Order EA-12-049. NSPM will be in compliance with the aspects of the Reference 2 Mitigation Strategies that do not rely upon a Hardened Containment Vent System (HCVS) unless otherwise described. Any request for relief will be provided in a separate letter to the NRC and referenced in a future six-month status report. It is anticipated this will occur prior to the February 2014 six-month status report.

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 MNGP mitigating strategies 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.

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-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ADAMS Accession No. ML12054A736).
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