



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

March 31, 2014

L-MT-14-027
10 CFR 50.54(f)

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

Request Commitment Change for Response to NRC Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident

References:

1. NRC Letter, "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012, ADAMS Accession No. ML12053A340.
2. NRC Letter, "Endorsement of Electric Power Research Institute Final Draft Report 1025287, 'Seismic Evaluation Guidance,'" dated February 15, 2013, ADAMS Accession No. ML12319A074.
3. Electric Power Research Institute (EPRI) Report Number 1025287, "Seismic Evaluation Guidance: Screening, Prioritization and Implementation Details (SPID) for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic," dated November 2012, ADAMS Accession No. ML12333A170.
4. Nuclear Energy Institute (NEI) letter to NRC, "Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations," dated April 9, 2013, ADAMS Accession No. ML13101A379.
5. NRC Letter, "Electric Power Research Institute Final Draft Report XXXXXX, 'Seismic Evaluation Guidance: Augmented Approach for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1: Seismic,' As an Acceptable Alternative to the March 12, 2012, Information Request for Seismic Reevaluations," dated May 7, 2013, ADAMS Accession No. ML13106A331.

6. NSPM Letter to NRC, "Request Commitment Change for Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated September 12, 2013, ADAMS Accession No. ML13255A480.
7. NSPM Letter to NRC, "NSPM's Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident- 1.5 Year Response for CEUS Sites," October 31, 2013, ADAMS Accession No. ML13304B167.
8. NSPM Letter to NRC, "MNGP's Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated April 29, 2013, ADAMS Accession No. ML13119A460.

On March 12, 2012, the Nuclear Regulatory Commission (NRC) Staff issued Reference 1 to all power reactor licensees and holders of construction permits in active or deferred status. Enclosure 1 of Reference 1 contains specific Requested Actions, Requested Information, and Required Responses associated with Near-Term Task Force (NTTF) Recommendation 2.1, Seismic Evaluations. Enclosure 1 of Reference 1 requested each addressee in the Central and Eastern United States (CEUS) to submit a written response consistent with the requested seismic hazard evaluation information (items 1 through 7) by September 12, 2013. On February 15, 2013, the NRC issued Reference 2, endorsing the Reference 3 industry guidance for responding to Reference 1. Section 4 of Reference 3 identifies the detailed information to be included in the seismic hazard evaluation submittals.

On April 9, 2013, NEI submitted Reference 4 to the NRC, requesting NRC agreement to delay submittal of some of the CEUS seismic hazard evaluation information so that an update to the EPRI (2004, 2006) ground motion attenuation model could be completed and used to develop that information. NEI proposed that descriptions of subsurface materials and properties and base case velocity profiles (items 3a and 3b in Section 4 of Reference 3) be submitted to NRC by September 12, 2013, with the remaining seismic hazard and screening information submitted to NRC by March 31, 2014. In Reference 5, the NRC agreed with the proposed path forward.

In Reference 8, Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, committed to submit the remaining information described in Section 4 of Reference 3 by March 31, 2014. EPRI provided the Monticello Nuclear Generating Plant (MNGP) seismic hazard results (i.e., Ground Motion Response Spectra (GMRS)), to be used for the March 31, 2014 submittal. The seismic hazard report provided by EPRI used shear wave velocities that were based on similar soils and firm rock. While shear wave velocities developed as part of the MNGP Independent Spent Fuel Storage Installation (ISFSI) design were provided to EPRI, the

information provided was not sufficient to generate the base case shear wave velocity profiles. Subsequent to receiving the seismic hazard report from EPRI, NSPM provided additional detail regarding the ISFSI soil data. Upon review, EPRI has concluded that the ISFSI data should be used to recalculate the GMRS.

As a result, NSPM requests to change the due date to no later than May 16, 2014 for the following Reference 8 commitment:

NSPM will submit the remaining information described in Section 4 of Reference 3.

Additional time is needed for EPRI to revise the base case velocity profiles and GMRS per the guidance in Reference 3, and for NSPM to incorporate the revised results into the final seismic hazard and screening report for MNGP.

Based on the current GMRS results, MNGP screens in for a risk evaluation. Therefore, in accordance with Reference 3, NSPM will complete a risk evaluation, a spent fuel pool evaluation, and a high frequency confirmation. NSPM will also submit the Expedited Seismic Evaluation Process (ESEP) report, as proposed in Reference 4 and agreed to by the NRC in Reference 5, as an interim action by December 31, 2014. The risk evaluation, the spent fuel pool evaluation, and high frequency confirmation will be submitted by the date assigned by the NRC. The date assigned by the NRC is based on the acceptability of the licensee's proposed risk evaluation approach and priority for completion, as stated in Enclosure 1 of Reference 1. In order to assist the NRC with its schedule and prioritization review, NSPM will provide the current GMRS results via the electronic reference portal.

NSPM submitted the description of subsurface materials and properties, and base case velocity profiles for the MNGP in Reference 7. Subsequent to the submittal of Reference 7, NSPM identified that the base case velocity profiles submitted in Reference 7 did not reflect the site-specific geotechnical data for MNGP. This discrepancy is being evaluated via MNGP's Corrective Action Program in Action Request 1423388. The revised base case velocity profiles will be provided in the final seismic hazard and screening report no later than May 16, 2014, as discussed above.

If there are any questions or if additional information is needed, please contact Ms. Jennie Wike, Licensing Engineer, at 612-330-5788.

Summary of Commitments

This letter makes two new commitments and revises an existing commitment.

	Regulatory Commitment	Due Date
1	NSPM will submit the remaining information described in Section 4 of Reference 3.	May 16, 2014
2	NSPM will submit the Expedited Seismic Evaluation Process (ESEP) report.	December 31, 2014
3	NSPM will complete the risk evaluation, the spent fuel pool evaluation, and high frequency confirmation.	Based on the priority assigned by the NRC

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

Executed on March 31, 2014.



Karen D. Fili
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power Company - Minnesota

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