



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

December 16, 2014

L-MT-14-092  
10 CFR 2.202  
EA-13-109

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 Nuclear Generating Plant: First Six-Month Status Report in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

- References:
- 1) NRC Order Number EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013. (ADAMS Accession No. ML13143A334)
  - 2) NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions," Revision 0, dated November 14, 2013. (ADAMS Accession No. ML13304B836)
  - 3) Letter from D. Skeen (NRC) to J. Pollock (NEI), Endorsement of "Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0," dated May 14, 2014. (ADAMS Accession No. ML14128A219)
  - 4) NEI 13-02, "Industry Guidance for Compliance with Order EA-13-109," Revision 0, dated November 2013.
  - 5) Letter from K.D. Fili (NSPM) to Document Control Desk (NRC), "MNGP's Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe

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Accident Conditions (Order Number EA-13-109),” L-MT-14-052, dated June 30, 2014. (ADAMS Accession No. ML14183A412)

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued Order EA-13-109 (Reference 1) to Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy. Reference 1 was immediately effective and directs NSPM to install a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris for Monticello Nuclear Generating Plant (MNGP). Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of a Phase 1 Overall Integrated Plan (OIP) pursuant to Section IV, Condition D. Reference 3 endorses industry guidance document, NEI 13-02, Revision 0 (Reference 4) with clarifications and exceptions identified in Reference 3. Reference 5 provided the MNGP Phase 1 OIP.

Reference 1 requires submission of a status report at six-month intervals following submittal of the Phase 1 OIP. References 2 and 4 provide direction regarding the content of the status reports.

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

Please contact John Fields, Fukushima Response Licensing, at 763-271-6707, 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 December 16, 2014.

A handwritten signature in black ink, appearing to read "Karen D. Fili". The signature is written in a cursive style with a large initial "K" and "F".

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

## ENCLOSURE

### MONTICELLO NUCLEAR GENERATING PLANT

#### FIRST SIX MONTH STATUS REPORT FOR THE IMPLEMENTATION OF NRC ORDER EA-13-109, “ORDER MODIFYING LICENSES WITH REGARD TO RELIABLE HARDENED CONTAINMENT VENTS CAPABLE OF OPERATION UNDER SEVERE ACCIDENT CONDITIONS”

### 1.0 Introduction

Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy developed a Phase 1 Overall Integrated Plan (Reference 1), documenting the installation of a Hardened Containment Vent System (HCVS) that provides a reliable wetwell hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris for the Monticello Nuclear Generating Plant (MNGP), in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Phase 1 Overall Integrated Plan (OIP), including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

### 2.0 Milestone Accomplishments

No milestones have been completed since the development of the OIP (Reference 1), and are current as of November 30, 2014.

### 3.0 Milestone Schedule Status

The following table provides an update to Part 5 of the MNGP HCVS Phase 1 OIP. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed (i.e., not considered formal regulatory commitments).

The revised target completion dates impact the Order Implementation date. Revised dates are provided in the Comments section of the table. An explanation of the impact of these changes is provided in Section 5 of this enclosure.

Milestone	Target Completion Date	Activity Status	Comments
<b>Phase 1 HCVS Milestone Table</b>			
Submit Overall Integrated Plan	June 2014	Complete	
<b>Submit 6 Month Updates:</b>			
Update 1	December 2014	Complete with this submittal	
Update 2	June 2015	Not Started	
Update 3	December 2015	Not Started	
Update 4	June 2016	Not Started	
Update 5	December 2016	Not Started	
<b>Modifications:</b>			
Hold preliminary/conceptual design meeting	June 2014	Complete	
Design Engineering On-site/Complete	March 2016	Not Started	
Implementation Outage	April 2017	Not Started	May 2017
Walk Through Demonstration/Functional Test	April 2017	Not Started	May 2017
<b>Procedure Changes Active:</b>			
Operations Procedure Changes Developed	September 2016	Not Started	
Site Specific Maintenance Procedure Developed	September 2016	Not Started	
Procedure Changes Active	April 2017	Not Started	May 2017

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Comments</b>
<b>Phase 1 HCVS Milestone Table</b>			
<b>Training:</b>			
Training Complete	April 2017	Not Started	May 2017
<b>Completion:</b>			
HCVS Implementation	April 2017	Not Started	May 2017
Submit Completion Report	June 2017	Not Started	July 2017

#### **4.0 Proposed Changes to Compliance Method**

There are no changes to the compliance method as documented in the Phase 1 OIP (Reference 1).

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

NSPM has changed the Order Implementation dates as reported in the MNGP HCVS Phase 1 OIP, Part 5 from April 2017 to May 2017 for the following items (see Section 3.0):

- Implementation Outage
- Walk Through Demonstration/Functional Test
- Procedure Changes Active
- Training Complete
- HCVS Implementation

The change to the above listed Order Implementation dates was made to align each item's completion date with the current projected completion of the 2017 refueling outage (the second refueling outage for MNGP after June 30, 2014).

In addition, NSPM has changed the Order Implementation date as reported in the MNGP HCVS Phase 1 OIP, Part 5 from June 2017 to July 2017 for the "Submit Completion Report" item. This change was made in order to maintain the Completion Report submittal 60 days after completion of the Order Implementation date, which is tied to the completion of the 2017 refueling outage, and changed as described above.

These changes do not result in the need for relief from the requirements of NRC Order EA-13-109 as the revised implementation dates meet the Order requirements. Namely, that Phase 1 of NRC Order EA-13-109 must be completed no later than startup from the second refueling outage that begins after June 30, 2014, or June 30, 2018, whichever comes first. Therefore, NSPM continues to comply with the Order Implementation date; no relief/relaxation is required at this time.

## 6.0 Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following tables provide a summary of the open items documented in the Phase 1 Overall Integrated Plan and the Interim Staff Evaluation (ISE) and the status of each item.

Overall Integrated Plan Phase 1 Open Item	Status
1. Follow industry guidance on missile protection for HCVS.	Open
2. Identify the 24 hour power supply for the HCVS.	Open
3. Determine radiological conditions for the FLEX portable equipment staging areas.	Open
4. Evaluate the Alternate Shutdown System Panel and Backup HCVS Operation Station locations for accessibility, habitability, staffing sufficiency, associated pathways from the control room and communication capability with vent-use decision makers.	Open
5. Determine approach or combination of approaches to control hydrogen.	Open
6. Determine the Qualification Method for HCVS instrumentation.	Open
7. Evaluate the effects of radiological and temperature constraints on the deployment of nitrogen bottles after 24 hours.	Open
8. Evaluate HCVS battery charger location for accessibility, habitability, staffing sufficiency, associated pathways from control room and communication capability with vent-use decision makers.	Open

Interim Staff Evaluation Open Item	Status
None – NSPM has not received an Interim Staff Evaluation for MNGP.	Not Applicable

## **7.0 Potential Interim Staff Evaluation Impacts**

There are no potential impacts to the Interim Staff Evaluation identified at this time as NSPM has not received an Interim Staff Evaluation for MNGP.

## **8.0 References**

The following references support the updates to the OIP described in this enclosure.

1. Letter from K.D. Fili (NSPM) to Document Control Desk (NRC), "MNGP's Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," L-MT-14-052, dated June 30, 2014. (ADAMS Accession No. ML14183A412)
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