



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

June 16, 2015

L-MT-15-034
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 2015-001-00: "Operations with a Potential to Drain the Reactor Vessel (OPDRV) Without Secondary Containment Operable"

During the 2015 Monticello Nuclear Generating Plant (MNGP) refueling outage maintenance activities involving Operations With a Potential to Drain the Reactor Vessel (OPDRV) were performed. Two of these OPDRV activities invoked NRC Enforcement Guidance Memorandum (EGM) 11-003, Revision 2, "Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements during Operations with a Potential for Draining the Reactor Vessel." These OPDRVs were performed while in Mode 5 without secondary containment fully operable in accordance with the Technical Specifications (TS), as expected and allowed for by the enforcement guidance.

Although these planned activities are allowed following the guidance of EGM 11-003, this condition is still reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the TS. Enclosed is MNGP Licensee Event Report (LER) 2015-001-00 reporting the application of the EGM 11-003 guidance.

Summary of Commitments

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

A handwritten signature in black ink, appearing to read 'Peter A. Gardner'.

Peter A. Gardner
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 Page 2 for required number of digits/characters for each block)

Estimated burden per response to comply with this mandatory 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 and Information Collections Branch (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.

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4. TITLE
Operations With A Potential To Drain The Reactor Vessel (OPDRV) Without Secondary Containment Operable

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
04	23	2015	2015	001	00	06	16	2015		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE **11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)**

5	<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 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 checked="" 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

LICENSEE CONTACT Stephen Sollom, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) (763) 295-1611
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	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 type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE MONTH: DAY: YEAR:
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On April 23 and 25, 2015, during planned Reactor Recirculation System modifications and maintenance, the provisions of NRC Enforcement Guidance Memorandum (EGM) 11-003 (Revision 2) were invoked for Operations With a Potential to Drain the Reactor Vessel (OPDRV) in noncompliance with Technical Specification (TS) 3.6.4.1, "Secondary Containment." These conditions are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation or condition prohibited by the TS that is under enforcement discretion as specified in EGM 11-003.

The safety significance of these noncompliances is minimal as EGM 11-003 specifies interim actions that provide an adequate level of safety. Implementation of EGM 11-003 for these actions was a planned activity and as such, no cause determination was performed for the events. Following development of a Technical Specification Task Force traveler a license amendment request will be submitted to resolve this issue as required by EGM 11-003.



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

Estimated burden per response to comply with this mandatory 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 and Information Collections Branch (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.

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NARRATIVE

EVENT DESCRIPTION

During the 2015 Refueling Outage (RFO), Operations With a Potential to Drain the Reactor Vessel (OPDRV) activities were performed. Most OPDRVs did not meet the criteria to invoke the provisions of NRC Enforcement Guidance Memorandum (EGM) 11-003 (Revision 2). However, on April 23 and 25, 2015, with the reactor cavity flooded to 21 feet, 11 inches, above the reactor vessel flange (Technical Specification (TS) 3.9.7, "Residual Heat Removal (RHR) – High Water Level" [BO]), the plant in MODE 5, and at 0.0 percent power, OPDRV activities were performed for which the provisions of EGM 11-003 were invoked, in noncompliance with TS 3.6.4.1, "Secondary Containment" [NG]. The plant performed the activities in accordance with the required actions of EGM 11-003, entitled, "Enforcement Guidance Memorandum 11-003, Revision 2, Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations With a Potential for Draining the Reactor Vessel." The specific OPDRV activities involved Reactor Recirculation System [AD] modifications and maintenance.

The NRC recognized that such activities may need to be performed during refueling outages while activities are underway with the Boiling Water Reactor [BWR] Owners Group (BWROG) to jointly formulate acceptable generic changes to the BWR TS. NRC guidance provided in EGM 11-003 provides specific interim actions that could be performed under enforcement discretion, as an alternative to compliance with the TS, while the improvements to the TS are under development by the NRC and BWROG. Plant procedure OWI-03.03, "Operation With Potential to Drain The Reactor," provides guidance to implement the interim actions specified in EGM 11-003. This procedure was utilized on two occasions invoking the guidance of EGM 11-003 during the 2015 RFO.

OPDRV Activity Invoking EGM 11-003	Start	End
12 Reactor Recirculation Pump seal replacement	4/23/15 (2222)	5/1/15*
		(0616)
	5/2/15*	5/8/15
	(0027)	(1620)
11 Reactor Recirculation Pump install new seal water piping and isolation vent valve assemblies	4/25/15 (1330)	5/1/15*
		(0616)
	5/2/15*	5/8/15
	(0027)	(1620)

* These OPDRV activities continued during the time period between May 1 and May 2, 2015, in accordance with TS requirements. Other OPDRV activities occurred during this period which required the use of EGM 11-003 to be suspended.

**LICENSEE EVENT REPORT (LER)
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NARRATIVE

EVENT ANALYSIS

These occurrences are being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as an operation or condition prohibited by TS, as additionally specified in EGM 11-003. The OPDRVs discussed in this report were performed during the 2015 RFO invoking the guidance of EGM 11-003 instead of full compliance with the TS for these planned activities.

SAFETY SIGNIFICANCE

The safety significance of these occurrences is minimal. As discussed in EGM 11-003, enforcement discretion related to secondary containment operability during Mode 5 OPDRV activities is appropriate because the associated interim actions necessary to receive enforcement discretion ensure an adequate level of safety. A plant procedure was developed to implement the interim actions specified in EGM 11-003. This procedure was applied for the OPDRV activities under the scope of EGM 11-003 during periods in which secondary containment was not operable.

CAUSE

Implementation of EGM 11-003 interim actions during the 2015 RFO was a planned activity. As such, no cause determination was needed for these events.

CORRECTIVE ACTION

A license amendment request will be submitted to adopt the Technical Specification Task Force (TSTF) traveler associated with the generic resolution for this issue, within twelve months after issuance of the Notice of Availability for the TSTF traveler as required by EGM 11-003. This action is being tracked in the Monticello Nuclear Generating Plant (MNGP) Corrective Action Program.

PREVIOUS SIMILAR EVENTS

A review of MNGP Licensee Event Reports from the last three years found no other instances where EGM 11-003 was invoked. EGM 11-003 was first issued in 2011.

ADDITIONAL INFORMATION

The Institute of Electrical and Electronics Engineer codes for equipment are denoted by [XX].