



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

April 19, 2016

Mr. Peter A. Gardner
Site Vice President
Monticello Nuclear Generating Plant
Northern States Power Company, Minnesota
2807 West County Road 75
Monticello, MN 55362-9637

**SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - EVALUATIONS OF CHANGES,
TESTS, AND EXPERIMENTS AND PERMANENT PLANT MODIFICATIONS
BASELINE INSPECTION REPORT 05000263/2016008**

Dear Mr. Gardner:

On March 24, 2016, the U.S. Nuclear Regulatory Commission (NRC) completed an Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications inspection at your Monticello Nuclear Generating Plant. The enclosed inspection report documents the inspection results which were discussed on March 24, 2016, with Mr. M. Lingenfelter and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

No findings were identified during this inspection.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Docket No. 50-263
License No. DPR-22

Enclosure:
IR 05000263/2016008

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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-263
License No: DPR-22

Report No: 05000263/2016008

Licensee: Northern States Power Company, Minnesota

Facility: Monticello Nuclear Generating Plant

Location: Monticello, MN

Dates: February 29 thru March 24, 2016

Inspectors: Alan Dahbur, Senior Reactor Inspector (Lead)
Jorge J. Corujo-Sandín, Reactor Inspector
Michael A. Jones, Reactor Inspector

Approved by: Robert C. Daley, Chief
Engineering Branch 3
Division of Reactor Safety

Enclosure

SUMMARY

Inspection Report 05000263/2016008; 02/29/2016 – 03/24/2016; Monticello Nuclear Generating Plant; Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications.

This report covers a 2-week announced baseline inspection on evaluations of changes, tests, and experiments and permanent plant modifications. The inspection was conducted by Region III based engineering inspectors. The U.S. Nuclear Regulatory Commission's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 5, dated February 2014.

NRC-Identified and Self-Revealed Findings

No findings were identified.

Licensee-Identified Violations

No violations were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R17 Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications (71111.17T)

.1 Evaluation of Changes, Tests, and Experiments

a. Inspection Scope

The inspectors reviewed 7 safety evaluations performed pursuant to Title 10, *Code of Federal Regulations* (CFR), Part 50, Section 59, to determine if the evaluations were adequate, and that prior U.S. Nuclear Regulatory Commission (NRC) approval was obtained as appropriate. The inspectors also reviewed 16 screenings where licensee personnel had determined that a 10 CFR 50.59 evaluation was not necessary. The inspectors reviewed these documents to determine if:

- the changes, tests, and experiments performed were evaluated in accordance with 10 CFR 50.59 and that sufficient documentation existed to confirm that a license amendment was not required;
- the safety issue requiring the change, tests or experiment was resolved;
- the licensee conclusions for evaluations of changes, tests, and experiments were correct and consistent with 10 CFR 50.59; and
- the design and licensing basis documentation was updated to reflect the change.

The inspectors used, in part, Nuclear Energy Institute Document 96-07, "Guidelines for 10 CFR 50.59 Implementation," Revision 1, to determine acceptability of the completed evaluations, and screenings. The Nuclear Energy Institute document was endorsed by the NRC in Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," dated November 2000. The inspectors also consulted Part 9900 of the NRC Inspection Manual, "10 CFR Guidance for 10 CFR 50.59, Changes, Tests, and Experiments."

This inspection constituted 4 samples of evaluations and 13 samples of screenings and/or applicability determinations as defined in Inspection Procedure 71111.17-04.

b. Findings

(Open) Unresolved Item 05000263/2016008-01, Failure to provide acceptable Alternate Methods of Decay Heat Removal

Introduction: The inspectors identified an Unresolved Item associated with Technical Specification (TS) 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling System – Cold Shutdown." Specifically, the licensee failed to verify that the capability of the alternate methods of decay heat removal described in Operations Manual C.4-B.03.04.A, "Loss of Normal Shutdown Cooling," were adequate to combat a loss of shutdown cooling resulting from the loss of one or two RHR subsystems while in MODE 4 with high decay heat load.

Description: The Limiting Condition for Operation (LCO) 3.4.8 of TS “Residual Heat Removal Shutdown Cooling System – Cold Shutdown,” required in Mode 4, two RHR shutdown cooling subsystems shall be operable, and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation. The TS Bases Section 3.4.8, indicated that an operable RHR shutdown cooling subsystem consisted of one operable RHR pump, one heat exchanger, the associated piping and valves, and the necessary portions of the RHR Service Water System System capable of providing cooling water to the heat exchanger.” The TS Bases Section 3.4.8 further indicated that the two subsystems have a common suction source and were allowed to have a common heat exchanger and common discharge piping. Thus, to meet the LCO, both pumps in one loop or one pump in each of the two loops must be operable. Since the piping and heat exchangers were passive components that were assumed not to fail, they were allowed to be common to both subsystems.”

When TS 3.4.8, LCO could not be met, Condition “A,” for one or two RHR shutdown cooling subsystems inoperable, the Required Action was to, “verify an alternate method of decay heat removal was available for each inoperable RHR shutdown cooling subsystem.” The completion time for the required action was 1 hour, and once per 24 hours thereafter. The TS Bases 3.4.8 for Condition “A” indicated that with one of the two required RHR shutdown cooling subsystems inoperable, the remaining subsystem was capable of providing the required decay heat removal. However, the overall reliability was reduced, therefore, an alternate method of decay heat removal must be provided. With both RHR shutdown cooling subsystems inoperable, an alternate method of decay heat removal must be provided in addition to that provided for the initial RHR shutdown cooling subsystem inoperability. This was to ensure the re-establishment of backup decay heat removal capabilities, similar to the requirements of the LCO. The bases further stated that the required cooling capacity of the alternate method should be ensured by verifying (by calculation or demonstration) its capability to maintain or reduce temperature. Alternate methods that can be used included (but not limited to) the Reactor Water Cleanup System by itself or using feed and bleed in combination with Control Rod Drive System or Condensate/Feed Systems.

Abnormal Procedure, Operations Manual C.4-B.03.04.A, “Loss of Normal Shutdown Cooling,” provided instructions for establishing alternate methods for decay heat removal. The inspectors noticed that except for the alternate method as described below in the G-EK-1-45, the licensee was not able to show by calculation or demonstration that the systems and methods credited in this procedure would be capable of providing sufficient heat removal capability or appropriate levels of redundancy as required by TS 3.4.8.

The G-EK-1-45 was a General Electric Letter to Northern States Power, Subject: Cold Shutdown Capability Report, dated April 22, 1981. This letter provided a report which described the capability of the Monticello Nuclear Generating Plant to achieve cold shutdown using only safety class systems and assuming the worst single failure. The alternate shutdown decay heat removal method used in the report credited combinations of the RHR pumps and heat exchangers in the suppression pool cooling mode of RHR to ensure suppression pool water temperatures were below the design limit. This method utilized the core spray system and safety relief valves to circulate reactor inventory to remove decay heat from the reactor.

The inspectors noted that calculations supporting the above alternate strategy utilized an RHR subsystem that could be inoperable and/or unavailable and therefore may not be credited to comply with TS 3.4.8. Specifically, the inspectors were concerned that while the plant was in mode 4, with a credited one subsystem inoperable, the licensees credited alternate decay heat removal method that relied on an RHR subsystem, to perform the required suppression pool cooling function. The inspectors were concerned that relying on the only operable RHR subsystem for the alternate method did not meet the intent of the TS requirement as described in the TS Bases. Furthermore, the inspectors noticed for Mode 4 with two RHR subsystems inoperable, the licensee failed to verify by calculation or demonstrations that two additional redundant alternate decay heat removal methods existed with sufficient capacity to maintain the average reactor coolant temperature below 212 degrees Fahrenheit.

During the inspection, the licensee indicated that the Boiling Reactor Owners Group was in the process of developing a draft TS Task Force Traveler to address the requirement of TS 3.4.8 and its Bases.

Based on the information above, the inspectors were concerned that the plant Operations Manual was inadequate and failed to include alternate decay heat removal methods that would enable the licensee to comply with the requirement of TS 3.4.8. The Operations Manual was required per TS 5.4.1 "Procedures," which required that written procedures shall be established, implemented, and maintained covering the emergency operating procedures. The inspectors determined that this issue was unresolved pending the actions by the licensee and the Boiling Reactor Owners Group and the NRC review of these actions. The licensee entered the inspectors' concerns into their Corrective Action Program as AR 01516098. (URI 05000263/2016008-01, Failure to provide acceptable Alternate Methods of Decay Heat Removal)

.2 Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed seven permanent plant modifications that had been installed in the plant during the last 3 years. This review included in-plant walkdowns portions of the high-pressure coolant injection steam drain line system, the Emergency Diesel Generator Fuel Oil Transfer System, including the Diesel Fuel Oil pump house, the new diesel fuel oil pumps installed in the day tank room, and portions of the fuel oil storage tank tornado missile protection modifications. The modifications were selected based upon risk significance, safety significance, and complexity. The inspectors reviewed the modifications selected to determine if:

- the supporting design and licensing basis documentation was updated;
- the changes were in accordance with the specified design requirements;
- the procedures and training plans affected by the modification have been adequately updated;
- the test documentation as required by the applicable test programs has been updated; and
- post-modification testing adequately verified system operability and/or functionality.

The inspectors also used applicable industry standards to evaluate acceptability of the modifications. The list of modifications and other documents reviewed by the inspectors is included as an Attachment to this report.

This inspection constituted eight permanent plant modification samples as defined in Inspection Procedure 71111.17-04.

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution

.1 Routine Review of Condition Reports

a. Inspection Scope

The inspectors reviewed several corrective action process documents that identified or were related to Title 10 of the *Code of Federal Regulations*, Part 50.59 evaluations and permanent plant modifications. The inspectors reviewed these documents to evaluate the effectiveness of corrective actions related to permanent plant modifications and evaluations of changes, tests, and experiments. In addition, corrective action documents written on issues identified during the inspection were reviewed to verify adequate problem identification and incorporation of the problems into the corrective action system. The specific corrective action documents that were sampled and reviewed by the inspectors are listed in the attachment to this report.

b. Findings

No findings were identified.

4OA6 Management Meetings

.1 Exit Meeting Summary

On March 24, 2016, the inspectors presented the inspection results to Mr. M. Lingenfelter, and other members of the licensee staff. The licensee personnel acknowledged the inspection results presented and did not identify any proprietary content. The inspectors confirmed that all proprietary material provided to the inspection team was identified and will be dispositioned in accordance with applicable processes.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

M. Lingenfelter, Director of Engineering
A. Gonnering, Design Engineering
M. Kelly, Performance Assurance Manager
J. Gausman, Engineering
A. Ward, Regulatory Affairs Manager
T. Hurrle, Design Engineering Manager
B. Halvorson, Engineering
A. Kouba, Regulatory Affairs
D. Alstad, Design Engineer
E. Watzel, Electrical Design Engineering Supervisor

U.S. Nuclear Regulatory Commission

P. Zurawski, Senior Resident Inspector
P. LaFlamme, Acting Senior Resident Inspector
D. Krause, Resident Inspector

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened

05000263/2016008-01 URI Failure to provide acceptable Alternate Methods of Decay Heat Removal (Section 1R17.1b)

Closed and Discussed

None

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
CFR	Code of Federal Regulations
LCO	Limiting Condition for Operation
NRC	U.S. Nuclear Regulatory Commission
PARS	Publicly Available Records System
RHR	Residual Heat Removal
TS	Technical Specifications

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

10 CFR 50.59 EVALUATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
SCR-12-0559	HPCI Logic Change to Provide Margin to MO-2035 and #16 Battery	1
SCR-13-0554	External Flooding Protection Strategy Change	0
SCR-15-0202	Evaluation of EPG/SAG, Revision 3	0
SCR-16-0024	Disconnect Faulty 46-19 PIP Over-Travel Input	0

10 CFR 50.59 SCREENINGS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
SCR-13-0696	Revise EDG Base Tank Fuel Oil Level Calculation 90-023	0
SCR-14-0074	Time Delay Relay 97-29 and 97-31 Setpoint Change	0
SCR-14-0413	Temp Rev to C.6-006-A-01 and C.6-006-A-02	
SCR-14-0415	USAR-06.06 Revision	0
SCR-14-0421	EC 23981 EDG Fuel Oil Tank Vent Lines Missile Protection	0
SCR-14-0512	Safety and Seismic Classification of the DG/RF and DG/RV Relays	0
SCR-14-0542	RHRWSW and Emergency Service Water TS Bases Changes	
SCR-14-0591	Fuel Oil Separation	4
SCR-14-0593	Revise Calculation 94-086 on SRV Accumulation Allowable Leakage Rates	0
SCR-15-0093	EDG ESW Basket Strainer Modification	
SCR-15-0115	C.4-B.09.02.A Revision to Resolve CAP AR 01465720	1
SCR-15-0193	Room Heat Up Calculation Revisions for SBO	
SCR-15-0291	Revise Maximum Volume of EDG Base Tank in 90-023	0
SCR-15-0292	Diesel Pump House Heat Up Calculation	0

CALCULATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
03-089	Inservice Testing Acceptance Criteria	3
09-106	CSP Motor-Oil and Bearing Operating Temperatures without Cooling Water	1
09-176	Evaluation for Debris Disposition in Supply Pipe and Motor Cooler Tube	0
09-178	Time to reach the RHRWSW Pump Motor Cooling Line Strainer Limiting Pressure Differential	0
14-025	Instrument Setpoint Calculation – Time Delay for Transfer to EDG on Loss of Voltage	0
90-023	EC 23085 – EDG Fuel Oil Train Separation	3
92-224	Emergency Diesel Generator Loading	6A
94-086	Max Allowed Leakage Rates and Test Acceptance Criteria for SRV	5

CORRECTIVE ACTION PROGRAM DOCUMENTS INITIATED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
1510936	Incomplete EC Record Copy	02/03/2016
1514133	Clarification for USAR Section 8.4.1.3	03/01/2016
1514202	Page missing from WO 00491265 Record	03/02/2016
1514369	Screening SCR 14-0421 Answered Question Incorrectly	03/03/2016
1514464	EDG Building Roof FOI 91-0265	03/03/2016
1515054	Bases for Procedure A.6 Contain Incorrect Statements	03/09/2016
1515688	Signs of Leakage around FO-11-3	03/15/2016
1515716	NRC not Provided with Latest Copy of EC23085	03/15/2016
1515907	Formal Evaluation for HPCI Drain Line Bypass Flow	03/16/2016
1515939	Question Raised on CRD 46-19	03/16/2016
1516098	Actions for when LCO 3.4.8, RA A.1 not met Unclear	03/17/2016
1516101	Core Spray Motor Cooling Design Basis Question	03/17/2016
1516105	HPCI SR Test Inconsistent with TS Bases	03/17/2016
1516106	RCIC Surveillance Required Test Inconsistent with TS Bases	03/17/2016

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED

<u>Number</u>	<u>Description or Title</u>	<u>Date</u>
952310	M91064A Quarterly Backflushing of Residual Heat Removal system and Core Spray Pump Motors	07/27/1991
01196451	CDBI EDG Base Tank Volume Calculation CA 90-023	09/03/2003
01355853	Update UFSAR for External Flooding Description Discrepancy	10/22/2012
01414416	Diesel Fuel Oil Temperature in Fuel Oil Transfer House is not Known	12/17/2013
01420875-03	Condition Evaluation on EDG Base Tank Level Issues	04/04/2014
01424477	Appendix R Fire Strategy for Fire Area XII incorrect	03/27/2014
1478798	EG Transfer Relay not Classified as Safety Related	05/13/2015
1484554	RHRWS-29-2 Handwheel/Stem Sheared off	06/29/2015
1502700	Catastrophic fail of MO-1900	11/19/2015

DRAWINGS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
NF-36175	Single Line Diagram – Station Connections	85
104B2506	Connection Diagram – Control Rod Drive Position Indicator Probe	
NH-46250	P&ID – High Pressure Coolant Injection System	83
NE-36399-9	Essential Bus Transfer Circuit – Division I	77
NE-36399-9B	Essential Bus Transfer Circuits – Division II	78
NF-36061	Equipment Location – Turbine Building EL 951'-0"	76
NF-36750	Standby Diesel Generator Building	8
NH-36241-1	Reactor Pressure Relief P&ID	78
NH-36051	P&ID Diesel Oil System	85
NH-178639-1	Levee Alignment and Bin Wall Plan	4
NF-119034-1	#11/#12 DG Fuel Oil System Isometric	78
NH-36253	P&ID Standby Liquid Control System	80
NH-36249	P&ID (Steam Side) High Pressure Coolant Injection System	82
NX-13142-42	Primary Steam & HPCI System	78

MODIFICATIONS

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
EC-14065	RHR SW Motor Cooler Strainers	1
EC-20887	LT-5200 River Level Setpoint Change for Upper Value	
EC-21934	Evaluation of Corrosion Found in the 11 EDG Coolant Expansion Tank	0
EC-21999	Equivalency Evaluation: RHR SW-17 is the emergency injection check valve for the RHR to RSW crosstie	0
EC-22008	Monticello 125V #12 Battery Modified Performance Test Profile	0
EC-22414	SQUG Evaluation of Diesel Oil Service Pump P-77	0
EC-23085	EDG Fuel Oil Train Separation	0
EC-23272	Revise EDG Base Tank Fuel Oil Level Calc 90-023	
EC-23616	Revise Setpoints for Relays 97-29 and 97-31	0
EC-23857	Recirc Pump Seal Water Piping	0
EC-25889	Operating with HPCI CV-2043 (Steam Trap Bypass) Open	0
EC-25266	EDG Fuel Oil Separation	0

OTHER DOCUMENTS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
10040-A-020	Technical Specification for Steel Roof Deck	2
FOI 91-0265	Qualification of the EDG Building Roof for Accumulated Snow Load	04/18/1994
FG-E-SE-03	50.59 Resource Manual	5
WO 00505386-30	EC23085 Pre-Op Testing Division I	05/06/2015
WO 00505386-29	EC23085 Pre-Op Testing Division II	04/26/2015
257HA354	Technical Specification for High Pressure Coolant Injection System	2
G-EK-1-45	Cold Shutdown Capability Report	04/22/1981
SRI 95-002	Core Spray Pump Motor Without Water Cooling	09/28/1995
EE 25506	RFO27 Decay Heat Evaluation	

PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Revision</u>
0075	Control Rod Drive Coupling Test	19
C.06-006-C-01	Diesel Oil Storage Tank T-44 Hi Low Level	6
C.06-006-C-02	Diesel Oil Storage Tank T-44 Low-Low Level	6
C.06-006-C-03	Division 1 EDG P-160A & P-160C Not Running	6
C.06-006-C-06	Diesel Gen Tank T-160A Level/Flow Low	4
2014-02	Turbine Building Outside	27
A.6	Acts of Nature	53
0255-17-ID-1	Master Alternate Nitrogen System Tests	25
0255-17-ID-15	SRV RV-71D and RV-2-71G Pneumatic Supply Leakage Test	13
Ops Man	Loss of Normal Shutdown Cooling	15
C.4-B.03.04.A		
1339	ECCS Pump Motor Cooler Flush	35
9111-01	Shutdown Cooling Division I Protected System Ticket Checklist	6
2270	Critical Safety System Checklist	11
OWI-02.03	Operator Rounds, Turbine Building West	64
Ops Man B.	Core Spray Cooling System	42
03.01-05		
0255-05-1A-1-2	B RHR SW Quarterly Pump and Valve Test	82

April 19, 2016

Mr. Peter A. Gardner
Site Vice President
Monticello Nuclear Generating Plant
Northern States Power Company, Minnesota
2807 West County Road 75
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - EVALUATIONS OF CHANGES, TESTS,
AND EXPERIMENTS AND PERMANENT PLANT MODIFICATIONS BASELINE
INSPECTION REPORT 05000263/2016008

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Sincerely,

/RA/
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