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February 16, 2017

L-MT-17-011
10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket No. 50-263
Renewed Facility Operating License No. DPR-22

Supplement to License Amendment Request for a Permanent Extension of the 10 CFR 50 Appendix J Containment Type A Test Interval (CAC No. MF7359)

- References:
- 1) NSPM (P. Gardner) to NRC, "License Amendment Request: Revise Technical Specification 5.5.11 to Provide a Permanent Extension of the Integrated Leakage Rate (Type A) Test Frequency from Ten to Fifteen Years," (L-MT-16-001), dated February 10, 2016 (ADAMS Accession No. ML16047A272 and ML16047A273)
 - 2) NRC (R. Kuntz) to NSPM (R. Loeffler), "Request for Additional Information RE: Monticello license amendment request for ILRT extension (CAC MF7359)," dated September 9, 2016 (ADAMS Accession No. ML16256A004)
 - 3) NSPM (P. Gardner) to NRC, "Response to Request for Additional Information: License Amendment Request for a Permanent Extension of the 10 CFR 50 Appendix J Containment Type A Test Interval (CAC No. MF7359)," (L-MT-16-044), dated October 10, 2016 (ADAMS Accession No. ML16284A015)
 - 4) NRC (R. Kuntz) to NSPM (R. Loeffler), "Monticello ILRT extension amendment Request for additional information (CAC No. MF7359)," dated November 18, 2016 (ADAMS Accession No. ML16323A242)
 - 5) NSPM (P. Gardner) to NRC, "Part 1 Response to Probabilistic Risk Assessment (PRA) Related Requests for Additional Information: License Amendment Request for a Permanent Extension of the 10 CFR 50 Appendix J Containment Type A Test Interval (CAC No. MF7359)" (L-MT-16-062), dated December 16, 2016 (ADAMS Accession No. ML16355A183)

- 6) NSPM (P. Gardner) to NRC, "Part 2 Response to Probabilistic Risk Assessment (PRA) Related Requests for Additional Information: License Amendment Request for a Permanent Extension of the 10 CFR 50 Appendix J Containment Type A Test Interval (CAC No. MF7359)" (L-MT-17-002), dated January 31, 2017
- 7) NSPM (P. Gardner) to NRC, "Part 3 Response to Probabilistic Risk Assessment (PRA) Related Requests for Additional Information: License Amendment Request for a Permanent Extension of the 10 CFR 50 Appendix J Containment Type A Test Interval (CAC No. MF7359)" (L-MT-17-007), dated February 7, 2017

On February 10, 2016, the Northern States Power Company, a Minnesota Corporation (NSPM), doing business as Xcel Energy, submitted a license amendment request (LAR) proposing a change the Technical Specifications (TS) for the Monticello Nuclear Generating Plant (MNGP). The proposed change is to permanently revise the frequency specified in Specification 5.5.11 "Primary Containment Leakage Rate Testing Program," to increase the containment integrated leakage rate test (ILRT) program Type A test interval from 10 years to 15 years (Reference 1).

It was discovered on February 10, 2017, that one Fact and Observation (F&O) from the March 2015 Fire PRA Peer Review had not been included in Appendix A.3 of the PRA calculation submitted as Enclosure 2 of the 15-Year ILRT LAR (Reference 1). It was identified that F&O 1-5⁽¹⁾ (a "Suggestion" F&O) had inadvertently been included instead of F&O 4-35 (a "Finding" F&O). F&O 4-35 concerns the apportionment of the ignition frequency of the main control board (MCB) to individual fire scenarios based on the number of cables. A copy of F&O 4-35 is attached behind this letter. Note that F&O 4-35 is closed and there is no impact on the ILRT extension license amendment or associated RAI responses (References 2-7).

This omission error has been entered into the MNGP Corrective Action Program. A review of all Internal Event, Fire and Focused Scope Fire Peer Review findings was conducted to assure that with this submission they have now all been provided to the NRC.

1. F&O 1-5 involves a labeling mismatch that was corrected prior to submittal of the LAR (PRA calculation, page 118).

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 February 16, 2017.



Peter A. Gardner
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power Company – Minnesota

Appendix: Fact and Observation 4-35

cc: Administrator, Region III, US NRC
Project Manager, Monticello Nuclear Generating Plant, US NRC
Resident Inspector, Monticello Nuclear Generating Plant, US NRC
State of Minnesota

APPENDIX

MONTICELLO NUCLEAR GENERATING PLANT

**SUPPLEMENT TO LICENSE AMENDMENT REQUEST FOR A PERMANENT
EXTENSION OF THE 10 CFR 50 APPENDIX J CONTAINMENT TYPE A TEST
INTERVAL**

FACT AND OBSERVATION 4-35

(1 page follows)

Facts and Observations (F&Os)

Change Number: MT-15-0080

F&O Number: 4-35

Associated SR(s): FSS-B2

Detailed Problem Description: The Main Control Room Analysis Notebook 016015-RPT-07 apportions the ignition frequency of the main control board (MCB) to individual scenarios based on the number of cables. PRA FAQ 14-0008 provides details for apportioning of the MCB ignition frequency if Appendix L is recalculated.

Proposed Solution: Remove the ignition frequency apportioning method and assign the entire MCB frequency to each scenario. Alternatively, provide technical justification for the apportioning of the MCB ignition frequency by cables or other method.

Basis for Significance: Appendix L is not utilized in the Main Control Room (MCR) analysis and ignition frequency should not be apportioned. Additionally, the number of cables may not be an appropriate method as cables could be routed through a MCB panel and not a termination point, therefore, the number of cables could be inaccurate.

Actual Solution: The methodology used in the Main Control Room Analysis Notebook 016015-RPT-07 is appropriate because the frequency is apportioned based on the density of cables and thus the concentration of sources (e.g., connections, switches) that are more likely to cause a fire. In addition, the methodology that has been implemented does not double count credit for the non-suppression probability for scenarios where control room abandonment is credited. The documentation provided in the Main Control Room Analysis Notebook gives a comparison to the approach recommended in NUREG/CR-6850, Appendix L. This comparison shows that the method used in the Monticello Fire PRA calculates a higher likelihood for the different fire scenario sequences modeled. The approach has the advantage of fully accounting for the MCB frequency and not double count non suppression probability credit when the control room abandonment is credited.

Impact on ILRT Extension: The F&O is closed, and there is no impact on the ILRT Extension Analysis.