



Monticello Nuclear Generating Plant
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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

Changes to Inspection Intervals for ASME Code, Subsection IWE Examinations and Supplemental Examinations of Torus Coatings Associated with License Amendment No. 193 for the Integrated Leak Rate Test Interval Extension

Northern States Power Company – Minnesota (NSPM), a Minnesota corporation, doing business as Xcel Energy, performed a review of the U.S. Nuclear Regulatory Commission (NRC) Safety Evaluation (SE) associated with issuance of License Amendment No. 193 authorizing extension of the Primary Containment Integrated Leak Rate Test (ILRT) performance from 10 to 15-years. During review of SE Section 3.4.1, “Containment Inservice Inspection [CISI] Program”, NSPM identified that subsequent to submittal of the license amendment request (LAR) the inspection schedule specified in the LAR (and reflected in the SE) for underwater torus coating examinations and the ASME Section XI, Subsection IWE general visual examinations had been changed. Upon identification of the discrepancy, NSPM contacted the NRC Project Manager to fully inform him of the situation. This letter is being submitted as a follow up to that discussion for the purpose of documenting the schedule change.

NSPM provided in Section 4.4.5, “Supplemental Inspection Requirements,” of the LAR, a schedule of the containment inspections to be performed prior to and between Type A tests.⁽¹⁾ The NRC staff reviewed this information and in Section 3.4.1 of the SE for the license amendment reiterated that the next underwater inspection of coatings was planned for Refuel Outage (RFO) 28 (2017) which coincides with the Third Period of the Second Interval for the Section XI, Subsection IWE examinations. This section of the SE concludes that the “MNGP primary containment will continue to be periodically inspected, as required by 10 CFR 50.55a and the ASME Code, according to the CISI Program, if the

1. The SE for Nuclear Energy Institute (NEI) Topical Report (TR) 94-01, Revision 2, “Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J” and Electric Power Research Institute (EPRI) Report No. 1009325, Revision 2, August 2007, “Risk Impact Assessment of Extending Integrated Leak Rate Testing Intervals,” requires licensees under “Limitations and Conditions” Item 2, to submit this schedule.

current Type A test interval is extended from 10 years to 15 years”. Furthermore, in Section 3.4.4 of the SE, under the subheading “Limitations/Condition 2” the NRC states “Based on the schedules contained in LAR Enclosure, Subsections 4.4.1 and 4.4.5, MNGP will meet the requirements of the proposed revision to TS 5.5.11; the inspection requirements of ASME Code Section XI, Subsection IWE; and NEI 94-01, Revision 2-A, Section 9.2.3.2.”

In January 2017, NSPM determined that, in accordance with the ASME Boiler and Pressure Vessel Code, 2001 Edition through 2003 Addenda, IWA-2430, “Inspection Intervals,” that the examination schedule for the Section XI Containment Inservice Inspection (IWE) Program could be modified to extend the Third Period of the Second Interval from September 8, 2018 to September 8, 2019. Subsequently, the schedule for performance of the Section XI, Subsection IWE general visual examinations and the supplemental examinations of the Torus coatings (below the waterline) discussed in the LAR was changed from RFO28 (2017) to RFO29 (2019). This change to the examination schedule provided in the LAR was not conveyed to the NRC and hence not reflected within the SE.

Moving performance of the Section XI, Subsection IWE general visual examinations and the underwater torus coatings inspections from the 2017 to the 2019 RFO is within the allowances provided within Section XI of the ASME Code and in NEI TR 94-01 that establish the required inspection frequency. Hence, this change does not impact the leak tightness and structural integrity of the containment beyond the conditions assumed by NEI TR 94-01 over the containment’s service life. The requirements of the ASME Section XI Code and the conditions of the NRC SE for NEI TR 94-01 for performing the inspections continue to be met. Therefore, age-related degradation and the structural integrity of the primary containment are adequately managed in accordance with program requirements. The Drywell and interior Torus surfaces-above-the-water-line coatings inspections as well as the inspection of the containment interior/exterior surfaces required by 10 CFR 50 Appendix J discussed in the LAR were performed during the 2017 RFO as scheduled. No evidence of significant degradation of the MNGP primary containment was noted during these inspections.

The Section XI IWE general visual examinations and the underwater Torus coatings inspections will be performed during the 2019 RFO to maintain compliance with programs requirements and verify structural and coating integrity.

Summary of Commitments

NSPM commits to performing Torus interior surface coating inspections (below the water line) and the Third Period ASME Section XI, Subsection IWE inspections during the 2019 Refueling Outage.

Should you have questions regarding this letter, please contact Mr. Richard Loeffler at (763) 295-1247.

A handwritten signature in black ink, appearing to read "Peter A. Gardner". The signature is written in a cursive style with a long horizontal stroke at the end.

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

cc: Administrator, Region III, USNRC
Resident Inspector, Monticello, USNRC
Project Manager, Monticello, USNRC
Minnesota Department of Commerce