

## **NRR-PMDAPem Resource**

---

**From:** Kuntz, Robert  
**Sent:** Wednesday, August 09, 2017 3:38 PM  
**To:** 'Fields, John S.'  
**Cc:** 'Gohdes, Peter D.'  
**Subject:** Request for Additional Information for Monticello Nuclear Generating Plant License Amendment Request dated March 24, 2017 RE: Emergency Response Organization

Mr. Fields,

On July 17, 2017 I forwarded a draft request for additional information (RAI). On Thursday August 3, 2017 a call to clarify the draft RAI was conducted. Following the clarification call, the final RAI was forward in an e-mail dated August 7, 2017 (and copied below). In addition to the items in the final RAI, the draft RAI contained the following request:

### **MNGP RAI-5**

LAR Enclosure 1, Attachment 1, Table 1, "Minimum Shift Staffing and Capability for Additions for Nuclear Power Plant Emergencies," should list all the on-shift and augmented ERO functions and positions that are considered minimum staff consistent with the staffing figures provided in the Emergency Plan. However, Table 1 is not consistent with the information provided for the minimum staff positions listed on the staffing figures for the OSC, TSC and EOF.

- a. Revise the Table1 and/or facility staffing figures as necessary to depict all minimum staffing positions, both on-shift and augmented for the OSC, TSC and EOF.
- b. Describe whether MNGP has conducted, or plans to conduct drills, tabletops, etc. to validate whether the minimum staffing positions identified in Table 1 can adequately assume and perform the facility's Emergency Plan functions in relief of the on-shift staff prior to full augmentation as described in the emergency plan or implementing procedures.

During the clarification call and subsequent review by the Nuclear Regulatory Commission staff, it was determined that the requested information was provided in the license amendment request and is not required to be provided. This e-mail is to clarify that the requested information in MNGP RAI-5 from the draft RAI is not required.

Robert Kuntz  
Senior Project Manager  
NRC/NRR/DORL/LPL-3  
(301) 415-3733

---

**From:** Kuntz, Robert  
**Sent:** Monday, August 07, 2017 8:16 AM  
**To:** Fields, John S. <[John.Fields@xenuclear.com](mailto:John.Fields@xenuclear.com)>  
**Subject:** Request for Additional Information for Monticello Nuclear Generating Plant License Amendment Request dated March 24, 2017 RE: Emergency Response Organization

Mr. Fields:

By application dated March 24, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML17083A083), Northern States Power Company, a Minnesota corporation (NSPM)

submitted a license amendment request (LAR) pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.90. The amendment submits changes to the Monticello Nuclear Generating Plant (MNGP) Emergency Plan for Commission review and prior approval in accordance with 10 CFR 50.54(q). The proposed changes would revise the MNGP Emergency Plan to increase the staff augmentation times for certain emergency response organization (ERO) positions from 30 and 60 minutes to 60 and 90 minutes, respectively.

The Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review. The following is the NRC staff's request for additional information (RAI). The NRC staff expects a response to this RAI within 30 days of this message.

Robert Kuntz  
Senior Project Manager (Monticello and Prairie Island)  
NRC/NRR/DORL/LPL3  
(301)415-3733

---

REQUEST FOR ADDITIONAL INFORMATION  
LICENSE AMENDMENT REQUEST  
EMERGENCY PLAN CHANGE  
MONTICELLO NUCLEAR GENERATING PLANT  
DOCKET NO. 50-263 (CAC NO. MF9467)

**MNGP RAI-1**

LAR Enclosure 1, Section 3.2.5, "Plant System Engineering, Repair and Corrective Actions Function," Technical Support Major Task c, states, in part (on page 26 of 42):

A review of procedural actions for this position demonstrated that failed fuel determinations as well as establishing recovery/reentry priorities would not be required during the first 60 minutes of the event. Initial reactor core stabilization activities are performed by the Operations crew under the direction of an SRO [Senior Reactor Operator].

Provide further justification for the extension in augmentation timing for the Core Thermal Engineer position. Specifically, clarify whether the SRO has the necessary expertise with core/thermal hydraulics, and possesses the ability to offer adequate functional oversight to assess core conditions. This justification should include a description of any procedure and information technology advances since the implementation of NUREG-0654, such as improvements that allow using a symptom-based emergency operating procedure network, and computerized or automated systems for the acquisition and display of parameters used to evaluate core conditions.

**MNGP RAI-2**

LAR Enclosure 1, Section 3.2.5, Repair and Corrective Actions Major Task c, states, in part (on page 26 of 42):

Historically, the repair functions associated with an event have been completed by Plant Equipment Operation (PEO) personnel on-shift who are qualified to respond to plant events and perform actions to stabilize the plant.

Describe the training and qualifications provided to the PEOs that would allow them to perform repair and corrective actions to justify the extension in augmentation times for the maintenance technicians. This justification should include a review that there will not be any conflict between the added collateral duties and other assigned emergency response functions.

### **MNGP RAI-3**

LAR Enclosure 1, Section 3.2.6, "Protective Actions (In-Plant) Function," Access Control/Dosimetry, states, in part (on page 27 of 42):

Radiation work permits (RWPs) establish the necessary preset warnings/alarms associated with use of the ED [electronic dosimeter]. Specific emergency RWPs have been developed for use during a declared emergency, which automatically provide the ED with emergency dose and dose rate alarms.

Provide further description about the tools and processes used for the task of access control, including a description of portal/contamination monitors, self-alarmed dosimeters, and automated access control system for the radiologically controlled area (RCA) that maintain active radiation work permits, which are readily available if an emergency is declared (e.g., the system verifies qualifications, dose margins, and access requirements).

### **MNGP RAI-4**

LAR Enclosure 1, Section 3.2.6, Protective Actions (In-Plant) Function Summary, states, in part (on page 28 of 42):

The proposed changes maintain the existing on-shift HP [health physics] technicians for the HP Coverage task. The proposed changes extend the 30-minute and 60-minute response times for the personnel to 60 minutes and 90 minutes, respectively. NSPM has implemented improvements in technology in the areas of dosimetry and access control at the MNGP which reduced the need for HP Technician actions in each of these areas during the early stages of event response.

Provide further justification for the extensions in time for the HP coverage task, including a description of the availability of installed area, process, airborne and effluent radiation monitors, automated systems and information technology solutions, and enhanced work processes that would be available under accident conditions.

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 3649

**Mail Envelope Properties** (2f4f3424d1344cc8a6596354030a2c56)

**Subject:** Request for Additional Information for Monticello Nuclear Generating Plant License Amendment Request dated March 24, 2017 RE: Emergency Response Organization  
**Sent Date:** 8/9/2017 3:38:20 PM  
**Received Date:** 8/9/2017 3:38:20 PM  
**From:** Kuntz, Robert

**Created By:** Robert.Kuntz@nrc.gov

**Recipients:**  
"Gohdes, Peter D." <Peter.Gohdes@xenuclear.com>  
Tracking Status: None  
"Fields, John S." <John.Fields@xenuclear.com>  
Tracking Status: None

**Post Office:** HQPWMSMRS05.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	7131	8/9/2017 3:38:20 PM

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**