

NRR-PMDAPem Resource

From: Kuntz, Robert
Sent: Wednesday, October 18, 2017 1:41 PM
To: 'Jurek, Shane M.'
Subject: Request for additional information RE: Monticello Request for Exemption from Appendix R Requirements (CAC NO. MF9586; EPID L-2017-LLE-00012)

Mr. Jurek,

By letter dated April 6, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17096A599), Northern States Power Company (the licensee) requested an Exemption from the requirements in Title 10 of *The Code of Federal Regulations* for Monticello Nuclear Generating Plant (MNGP). Specifically, the letter requested exemption from the requirements of 10 CFR 50, Appendix R, Subsection III.G.2 with respect to the physical separation of the control circuitry for the drywell spray motor-operated valves.

The NRC staff has determined that additional information is required to complete its review. The following is a request for additional information (RAI). As discussed during a clarification call conducted on October 18, 2017, a response is expected to the following RAI by November 20, 2017. If Xcel Energy determines that a response cannot be provided by November 20, 2017 contact me.

Robert Kuntz
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NRC/NRR/DORL/LPL3
(301)415-3733

DRAFT REQUEST FOR ADDITIONAL INFORMATION
RISK-INFORMED APPENDIX R, III.G.2 EXEMPTION REQUEST
MONTICELLO NUCLEAR GENERATING PLANT
NORTHERN STATES POWER COMPANY
DOCKET NO. 50-263
CAC NO. MF9586; EPID L-2017-LLE-00012

By letter dated April 6, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17096A599), Northern States Power Company (the licensee) requested an Exemption from the requirements in Title 10 of The Code of Federal Regulations for Monticello Nuclear Generating Plant (MNGP). Specifically, the letter requested exemption from the requirements of 10 CFR 50, Appendix R, Subsection III.G.2 with respect to the physical separation of the control circuitry for the drywell spray motor-operated valves.

The U.S. Nuclear Regulatory Commission staff has reviewed the exemption request and determined that the following additional information is required in order to complete the review:

RAI 01

Enclosure 1 Section 3.4.3 of the exemption request provides an assessment of safety margins and concludes that sufficient safety margins are maintained. However, the assessment only addresses the design and installation of the shorting switches and not the performance-based assessment supporting the exemption request.

Provide technical information to support that the performance-based aspects of safety margins meet the guidelines specified in Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," Section C.2.1.2, "Safety Margin."

RAI 02

Enclosure 1 Section 3.4.5 of the exemption request states that a performance-based monitoring program will be established for the shorting switches in accordance with Appendix R programmatic requirements. However, no description of this program was provided nor an implementation schedule.

Provide the following:

- 1) Describe the status of the development of this monitoring program and the schedule for implementation.
- 2) Provide a brief summary of the monitoring program and how it meets the Appendix R programmatic requirements.
- 3) Describe the performance criteria and explain why this criteria is appropriate for the shorting switch application.
- 4) Explain how trending of degradation and failures will be assessed, and the process for identifying and implementing corrective actions.

Hearing Identifier: NRR_PMDA
Email Number: 3788

Mail Envelope Properties (7ccc4c9373ad4a9d8451d9a833db5307)

Subject: Request for additional information RE: Monticello Request for Exemption from Appendix R Requirements (CAC NO. MF9586; EPID L-2017-LLE-00012)
Sent Date: 10/18/2017 1:40:53 PM
Received Date: 10/18/2017 1:40:54 PM
From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:
"Jurek, Shane M." <Shane.Jurek@xenuclear.com>
Tracking Status: None

Post Office: HQPWMSMRS05.nrc.gov

Files	Size	Date & Time
MESSAGE	3460	10/18/2017 1:40:54 PM

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