

**Pre-Application Meeting  
License Amendment for TSTF-425**

**Relocation of Specific Surveillance  
Frequency Requirements to a Licensee  
Controlled Program**

**Xcel Energy (XE)  
Monticello Nuclear Generating Plant**

12-12-17

# Agenda



- Meeting Purpose
- Background and Schedules
- License Amendment Request (LAR) Interface
- Proposed Approach
- Summary
- Feedback and Questions

# Meeting Purpose

---

- Discuss proposed approach for interface between TSTF-425 and TSTF-542
  - Potential exists to relocate several TS SR frequencies to the Surveillance Frequency Change Program (SFCP) that are a part of the TSTF-542 LAR currently under NRC review
- Obtain staff feedback on proposed approach

- TSTF-425
  - Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (Initiative 5b)
  - Licensee controlled program called the SFCP and is in accordance with NEI 04-10
  - Planned submittal December 2017 with minimal variation from the TSTF
  - Requesting approval by January 2019
  - Implement prior to Spring 2019 Refueling Outage (RFO)

# Background & Schedules



- TSTF-542
  - Replaces the existing TS requirements related to "operations which have the potential for draining the reactor vessel" (OPDRVs) with new requirements on Reactor Pressure Vessel Water Inventory Control (RPV WIC) to protect Safety Limit 2.1.1.4
  - Submitted October 2017
  - Requested approval by December 20, 2018
  - Acceptance letter indicated approval by October 2018
  - Implemented prior to Spring 2019 RFO

# Background & Schedules



- Timing of Submittals & Approvals:
  - October 20, 2017 - TSTF-542 submittal
  - December 2017 - TSTF-425 submittal
  - October 2018 – TSTF-542 approval (per acceptance letter)
  - January 2019 – TSTF-425 potential approval
  - Prior to Spring RFO (April 2019) – TSTF-542 and TSTF-425 implemented

# LAR Interface



- TSTF-542 TS SRs frequencies eligible for relocation to the SFCP under TSTF-425
  - TS SR affected (new surveillances, wording changes, frequency change from Inservice Test (IST) to periodic)
  - LARs are not linked
    - TSTF-542 allows relocating the TS SR frequencies to SFCP (NUREG-1433 has incorporated TSTF-425)
    - TSTF-542 variations remain in scope of TSTF-425

# Proposed Approach

---

- Following approval of TSTF-542, submit supplement to TSTF-425 LAR
  - Relocate the frequencies of new or modified TSTF-542 TS SRs to the SFCP
  - Changes do not affect LAR's No Significant Hazards Consideration (NSHC)
- Efficiency promoted for both XE and NRC
  - XE relocation to SFCP all under one application
  - NRC noticing and review occurs once within TSTF-425 and not an additional application
- Precedent



# Proposed Approach



- TS Markups:
  - New TS 3.3.5.3
    - New SR 3.3.5.3.1
    - New SR 3.3.5.3.2
  - Modified TS 3.5.2
    - Changed SR 3.5.2.1
    - Changed SR 3.5.2.2
    - Changed SR 3.5.2.4
    - Changed SR 3.5.2.5
    - New SR 3.5.2.6
    - New SR 3.5.2.7

# Proposed Approach



- Proposed Timeline
  - October 2017 - TSTF-542 submittal
  - December 2017 - TSTF-425 submittal
  - October 2018 – TSTF-542 approval
  - October 2018 – Supplement TSTF-425 LAR
  - January 2019 – TSTF-425 approval
  - April 2019 – TSTF-542 and TSTF-425 implemented prior to Spring 2019 RFO

# Summary



- SR's associated with TSTF-542 are eligible for relocation to the SFCP
  - TSTF-542 recognizes and provides options for licensees with SFCPs
  - Relocating TSTF-542 frequencies is within the scope of TSTF-425
- Proposed approach to supplement TSTF-425 LAR after approval of TSTF-542
  - Precedent
  - LARs not linked
  - Promotes XE and Staff efficiency

# Feedback and Questions

---



# Acronyms

---

- LAR – License Amendment Request
- NEI – Nuclear Energy Institute
- NSHC – No Significant Hazards Determination
- NSPM – Northern States Power Minnesota
- OPDRV – “operations which have the potential for draining the reactor vessel”
- RFO – Refueling Outage
- RPV WIC - Reactor Pressure Vessel Water Inventory Control
- SFCP – Surveillance Frequency Change Program
- TS SR – Technical Specification Surveillance Requirement
- TSTF – Technical Specification Task Force
- XE – Xcel Energy