

## **NRR-DMPSPeM Resource**

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**From:** Kuntz, Robert  
**Sent:** Thursday, July 12, 2018 1:04 PM  
**To:** Scott, Sara  
**Subject:** MONTICELLO NUCLEAR GENERATING PLANT – AUDIT PLAN AND SETUP OF ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST – ADOPTION OF TSTF 425 AND 50.69 RISK CATEGORIZATION (EPIDS: L-2017-LLA-0434 AND L-2018-LLA-007)]  
**Attachments:** TSTF 425 and 5069 amendment eportal audit plan.docx

Ms. Scott,

By applications dated December 19, 2017 and March 28, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML17353A189 and ML18087A323), Northern States Power Company (NSPM, the licensee) submitted license amendment requests for the Monticello Nuclear Generating Plant (MNGP). The proposed changes would adopt TSTF-425 and 10 CFR 50.69.

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) reviews, the licensee's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff and contractors limited read-only access to the basis documents and other reference materials cited in the applications. The staff plans to initially conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit basis documents to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. Documents identified as necessary for analysis of the application will be identified by the NRC staff. The licensee will be formally requested to submit those documents on the NRC docket. Use of the online reference portal is acceptable, as long as the following conditions are met:

- the online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- the online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents; and
- conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the documents listed in the attachment. This is the initial list identified by the NRC staff. The staff may request additional documents during the review, which will be transmitted to you via email. This audit will potentially obviate the need for an onsite audit and potential requests for additional information. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as username and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that NSPM agrees to the terms and conditions set forth in this letter.

If you have any questions, please contact me.

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

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**Subject:** MONTICELLO NUCLEAR GENERATING PLANT – AUDIT PLAN AND SETUP OF ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST – ADOPTION OF TSTF 425 AND 50.69 RISK CATEGORIZATION (EPIDS: L-2017-LLA-0434 AND L-2018-LLA-007)]

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**Received Date:** 7/12/2018 1:03:00 PM

**From:** Kuntz, Robert

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

**Recipients:**

"Scott, Sara" <Sara.Scott@xenuclear.com>

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**Post Office:**

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MESSAGE	2690	7/12/2018 1:03:00 PM
TSTF 425 and 5069 amendment eportal audit plan.docx		33888

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

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## **AUDIT PLAN**

### **BACKGROUND**

By applications dated December 19, 2017 and March 28, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML17353A189 and ML18087A323), Northern States Power Company (NSPM, the licensee) submitted license amendment requests (LARs) for the Monticello Nuclear Generating Plant (MNGP). The proposed changes would adopt TSTF-425 "Relocate Surveillance Frequencies to Licensee Control - Risk Informed Technical Specifications Task Force (RITSTF) Initiative 5b," and apply Title 10 of the *Code of Federal Regulations* (CFR) 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors." For the subject LARs, the licensee performed an independent assessment consistent with Appendix X to NEI 05-04, 07-12, and 12-13 for closure of Facts and Observations (F&Os). In a letter dated May 3, 2017 (ADAMS Accession No. ML17079A427), the NRC transmitted a letter to Nuclear Energy Institute (NEI) with conditions of acceptance for the Appendix X process. The letter of acceptance explicitly states in part, "[t]he NRC also intends to periodically conduct audits of a licensee's implementation of the Appendix X F&O closure process, as well as review a sampling of the final independent assessment team reports." In addition, 10 CFR 50.69(b)(B)(4) states in part that, "[t]he Commission will approve an applicant's implementation of this section if it determines that the process for categorization of RISC [risk-informed safety class]-1, RISC-2, RISC-3, and RISC-4 SSCs [system, structures, and components] satisfies the requirements of §50.69(c)."

The 10 CFR 50.69 LAR states that, "[t]he decision criteria for the [integrated decision-making plan] IDP for categorizing SSCs as HSS [high safety significance] or LSS [low safety significance] pursuant to 10 CFR 50.69(f)(1) will be documented in NSPM procedures." Furthermore, the LAR states that the categorization process being implemented through this change is consistent with the NEI 00-04 "10 CFR 50.69 SSC Categorization Guidelines," (ADAMS Accession No. ML052910035) in which the NRC staff has endorsed as acceptable for use in complying with the Commission's requirements in 10 CFR 50.69.

### **REGULATORY AUDIT BASES**

The U.S. Nuclear Regulatory Commission (NRC) staff determined an audit to be the most efficient approach toward a timely resolution of questions associated with this license amendment request review, since the staff will have an opportunity to minimize the potential for further rounds of requests for additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The staff is requesting online access to an initial set of documentation to be reviewed at the NRC headquarters. Upon completion of this desk audit, the staff is expected to achieve the following.

1. Determine the need for additional documentation.
2. Develop a request for additional information as needed.
3. Decide if a site audit is required to verify information.

Any RAIs will be issued soon after the audit, with an expected response being delivered by the licensee by an agreed upon date. The information discussed in the audit to be included in

the development of the technical NRC staff's safety evaluation will be requested to be submitted on the docket.

### **REGULATORY AUDIT SCOPE OR METHODOLOGY**

The desk audit is being conducted to get a better understanding of the submittals and the availability of the information to make an assessment of the staff's review approach. The areas of focus for the regulatory audit are the information that will be requested by the NRC. The staff will review the documentation and generate any RAIs necessary to complete the review. It will also lead to the decision if a site audit is necessary.

### **INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT**

The information required for the initial desk audit is:

- The closure report(s) for the independent assessment(s) conducted in August 2017, and October 2017 for electronic audit for staff review.
- All plant-specific and/or fleet procedures governing probabilistic risk assessment (PRA) configuration and control for maintenance update/upgrade. (This should include procedures for the process used for tracking PRA changes (e.g., PRA tracking database, Corrective Action Program)
- All plant-specific and/or fleet procedures governing the 50.69 risk categorization process. (This should include draft procedures available at this time)
- All plant-specific and/or fleet procedures governing the development of PRA analyses and/or calculations.

The licensee will be informed via electronic mail if there is a need for additional supporting documentation.

### **TEAM ASSIGNMENTS**

Key licensee personnel involved in the development of the RAI responses should be made available on a mutually agreeable schedule to respond to any questions from the NRC staff.

<b>Team Member</b>	<b>E-mail address</b>	<b>Association</b>	<b>Area of Responsibility</b>
Robert Kuntz	Robert.kuntz@nrc.gov	NRR/DORL/LPL3	Project Management
Adrienne Driver	Adrienne.driver@nrc.gov	NRR/DRA/APLA	Technical reviewer
Todd Hilsmeier	Todd.hilsmeier@nrc.gov	NRR/DRA/APLA	Technical reviewer
Mihaela Biro	Mihaela.bir@nrc	NRR/DRA/APLA	Technical reviewer
Garill Coles	Garill.coles@pnnl.gov	NRC Contractor	Technical reviewer
Steve Short	Steve.short@pnnl.gov	NRC Contractor	Technical reviewer

## **LOGISTICS**

The audit will be started once an electronic portal is set up and the documentation is made available to the NRC staff. The desk audit will be conducted over a few weeks consistent with the internal review schedule for the issuance of the request for additional information. The licensee will be kept informed on a regular basis during bi-weekly discussions with the project manager regarding the progress.

## **DELIVERABLES**

The NRC team will develop an audit summary report to convey the results. The report will be placed in ADAMS within 30 days of the completion of the final audit session. The NRC will also finalize the RAIs after completion of the audit and issue them to the licensee.