

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY  
MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

REQUEST FOR AMENDMENT TO  
OPERATING LICENSE NO. DPR- 22  
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(License Amendment Request Dated August 15, 1975)

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Technical Specifications as shown on the attachments labeled Exhibit A and Exhibit B. Exhibit A describes the proposed changes along with reasons for the change. Exhibit B is a set of Technical Specification pages incorporating the proposed changes.

This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By *L. J. Wachter*  
L J Wachter  
) Vice President, Power Production &  
System Operation

On this 15th day of August, 1975, before me a notary public in and for said County, personally appeared L J Wachter, Vice President, Power Production & System Operation, and first being duly sworn acknowledged that he is authorized to execute this document in behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

*Denise E. Branau*

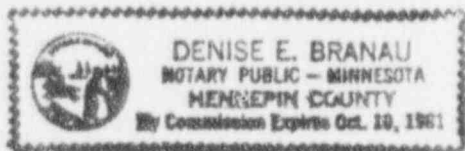


EXHIBIT A

MONTICELLO NUCLEAR GENERATING PLANT  
DOCKET NO. 50-263

LICENSE AMENDMENT REQUEST DATED AUGUST 15, 1975

PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS  
APPENDIX A OF OPERATING  
LICENSE DPR-22

Pursuant to 10CFR50.59, the holders of License DPR-22 hereby propose the following changes to Appendix A, Technical Specifications:

1. Table of Contents, Page iii

Proposed Change

Add the following entry to the Table of Contents:

Under 3.6 and 4.6, Primary System Boundary, add  
H. Hydraulic Snubbers, P. 121.

Reason for Change

New Technical Specifications 3.6.H and 4.6.H are added to the table of contents.

2. Specifications 3.6.H and 4.6.H Hydraulic Snubbers

Proposed Changes

Add new technical specifications and bases 3.6.H and 4.6.H covering safety related hydraulic snubber operability and surveillance requirements, as contained in attached Exhibit B.

Reasons for Changes

These additional technical specification requirements are submitted in response to a letter dated July 11, 1975, from Mr Dennis L Ziemann of the NRC Division of Reactor Licensing to Mr L O Mayer of Northern States Power Company.

Several minor modifications have been made to the model technical specifications and bases proposed by the Regulatory Staff to adapt them to the Monticello format and in accordance with discussions with representatives of the Regulatory Staff.

The model technical specification suggests the inclusion of a table listing those snubbers that are not safety related. We object to

this on the basis that if new snubbers are added to non-safety related systems they must be inspected and if found inoperable, counted to determine the next inspection interval; this paradox will exist until a license amendment request has been prepared, submitted, reviewed and approved by the NRC. We believe that the licensee for operating plants should establish a "Q" list of those snubbers that are safety related and the technical specification simply require that all safety related snubbers (as established by the Q list) meet the proposed operability and surveillance requirements. For new plants, the safety related snubbers could be tabulated in the FSAR. In either situation, snubbers could be added or removed by the normal 10CFR50.59 process without requiring the formal and time consuming license amendment process to revise the list of snubbers. It is our understanding that such a procedure is not acceptable to the Regulatory Staff at this time. We have chosen the alternate of listing those snubbers that are safety related; however, this introduces the paradox of finding the need to install a safety related snubber, but having completion of the design review and installation process thwarted until the license amendment requirements have been fulfilled. We have also experienced a case where revision of piping during an outage resulted in the removal of a snubber which would, under the proposed technical specifications, require a license amendment. To permit a reasonable solution to these difficulties, we have added Technical Specification 3.6.H.5.

Technical Specification 4.6.H.3 has been changed from the NRC model to allow entering the inspection schedule in TS 4.6.H.1 as though the facility had been on a 12-month inspection schedule. We believe this is justified on the basis that 1) ethylene propylene seal materials were installed in all snubbers in February, 1974; 2) all safety related snubbers located within containment were inspected during an outage in June, 1974, and those outside containment were inspected in August, 1974, with none found inoperable; 3) all snubbers were inspected during outages in November, 1974, and January, 1975, with none found inoperable; 4) one snubber in an isolable line outside containment was found inoperable in February, 1975; 5) all snubbers were inspected during an outage in May, 1975, with none found inoperable; 6) no other inoperable snubbers have been found to date. All safety related snubbers will be inspected during the 35-day Monticello outage planned to commence on September 12, 1975. Assuming no inoperable snubbers are found during that outage, we believe that lengthening the inspection frequency to 18 months at that time is fully warranted. If the results of the September inspection detect inoperable snubbers, the inspection interval will, of course, be adjusted in accordance with the technical specification requirement.

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