UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50- 263

REQUEST FOR AMENDMENT TO OFERATING LICENSE NO. DPR- 22.

(License Amendment Request Dated January 31, 1977)

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Technical Specific tions 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 S. S. Ita

Vice President, Power Production . System Operation

On this <u>31st</u> day of <u>January</u>, <u>1977</u>, before me a notary public in and for said County, personally appeared L J Wachler, 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.

Robert E. Hessian



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MONTICELLO NUCLEAR GENERATING PLANT DOCKET NO. 50-263

LICENSE AMENIMENT REQUEST DATED JANUARY 31, 1977

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

Pursuant to 10CFR50.59, the holders of the above mentioned license hereby propose the following chauges to Appendix A Technical Specifications:

1. New Specifications 3.13 and 4.13, Fire Detection and Protection Systems

PROPOSED CHANGE

Add new specifications 3.13 and 4.13 to incorporate interim limiting conditions for operation and surveillance requirements for the fire detection and protection systems. Refer to Exhibit B, pages vi and 189R through 189W.

REASON FOR CHANGE

These changes are being summitted in response to a letter dated December 6, 1976 from Mr D L Ziemann, Chief, Operating Reactors Branch No. 2, Division of Operating Reactors, USNRC. With several exceptions the changes closely follow the intent of the standard technical specifications provided as an enclosure to this letter.

We have taken exception to the guidance provided in the standard technical specifications in the following areas:

Area

Exception & Reason

1.	Reporting of inoperable fire detection and protection equip- ment during periods of cold shutdown or refueling	No provision for submitting reports of inoperable equipment during these periods was included in the proposed interim technical specifications. Required pre- ventative and corrective maintenance and testing will always be conducted in a manner which minimizes equipment in- operability.
2.	Tests of fire detector alarm circuitry	No separate tests of alarm circuitry are included in the proposed interim technical specifications. All alarm circuits are supervised. Detector functional tests will include verification of alarm circuit operability.

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Area

- Start test of fire suppression water system pumps
- Actuation tests of valves in the fire suppression water system
- Inoperability of fire suppression water system piping and values
- Permitted outage time for pumps
- Hydraulic performance testing of fire suppression water system
- 8. Spray and sprinkler systems
- 9. Carbon dioxide systems
- 10. Halon system
- 11. Hose station inspection frequency
- Local leak testing of fire seals performing a pressure sealing function

Exception & Reason

Five minutes in lieu of 15 minutes of testing on recirculation flow are specified. This conforms to Section XI of the ASME Code.

No testing is specified. There are no automatic valves in safety related portions of the fire suppression water system.

Provisions were added to permit sections of the system to be removed from service for up to 14 days. This allows for periodic maintenance of piping and valves.

The permitted outage time for one of the two required pumps was increased to 14 days. We believe this period of time is more consistent with the safety significance of this equipment.

No testing is specified. Hydraulic performance was verified during preoperational testing, and is not expected to change significantly over the life of the plant.

No requirements are specified. No spray or sprinkler systems are installed to protect safety related areas.

No requirements are specified. No carbon dioxide systems are installed.

No requirements are specified. No Halon systems are installed.

Monthly inspections have been specified. This conforms to existing guidelines for hose station inspections. There is no basis for more frequent inspections.

No local leakage tests are specified. The only seals performing a pressure sealing function are installed in the secondary containment boundary. A visual inspection is adequate to assure satisfactory leak tightness. The seals are not subject to degradation with time; therefore an 18 month inspection interval is more than adequate.

SAFETY EVALUATION

The proposed change adds new specifications 3.13 and 4.13 to the Monticello Appendix A Technical Specifications. These specifications establish limiting conditions for operation for the fire detection and protection systems and formalize surveillance testing for these systems. They apply to the current plant configuration. They are interim technical specifications which are to remain effective until the Monticello fire hazards analysis has been evaluated and technical specifications based on the results of that analysis are placed into effect.

These new specifications provide added assurance of satisfactory performance of the fire detection and protection system. They will have no adverse effect on other systems related to safety, they have no potential for creating any accident or malfunction not previously considered in the Final Safety Analysis Report, and they have no effect on any margin of safety.

2. Section 6, Administrative Controls

PROPOSED CHANGE

Make a number of additions to Section 6, Administrative Controls, to include the fire protection program. Refer to Exhibit B, pages 1x, 192, 192A, 194, 194A, 197, 198, 201, and 202.

REASON FOR CHANGE

These changes are being submitted in response to a letter dated December 6, 1976 from Mr D L Ziemann, Chief, Operating Reactors Branch No. 2, Division of Operating Reactors, USNRC. The changes closely follow the intent of the guidance provided as an enclosure to this letter except as noted below.

In establishing requirements for the fire brigade, we have chosen to distinguish between two conditions:

- Condition A activities may be in progress which constitute a significant fire hazard. This condition exists on the day shift on week days, during refueling outages, and at other times when special work activities presenting a fire hazard (such as welding and burning) are in progress.
- Condition B no activities are in progress which constitute a fire hazard. This condition exists after normal working hours and on weekends during periods of routine plant operation.

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During condition A, a fire brigade of at least three members will be present on site. These individuals will be in addition to the minimum specified shift complement, except that one fire brigade member may, if necessary, be drawn from the shift organization for a period up to two hours if action is taken to replace him. During condition B, when no significant fire hazard exists, the fire brigade may be drawn from the minumum shift complement. At least five individuals are on shift at all times when the reactor is above cold shutdown.

With the annual independent fire protection and loss protection inspection and audit and the 3-year fire consultant inspection and audit, we believe that additional audits by the Safety Audit Committee are not necessary. Technical Specification 6.2.A.5 has been revised to include Safety Audit Committee review of changes to the Fire Protection Program and review of the independent fire inspections and audits. This is similar to the extent and detail contained in our current Technical Specifications for review and audit of nuclear safety-related activities. The existing Administrative Work Instructions for conduct of Safety Audit Committee audits will be expanded to include fire protection training and drills similar to that included for the Emergency Plan and the Security Plan.

A number of minor changes to specification 6.1 have also been included to make this section more closely conform to NRC guidance in this area.

SAFETY EVALUATION

Refer to the Safety Evaluation included in item (1) above.

EXHIBIT B

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DPR-22 LICENSE AMENDMENT REQUEST DATED JANUARY 31, 1977

This exhibit consists of pages containing the proposed changes to the Appendix A Technical Specifications:

Page vi ix 1 *189R *1895 *189T *1890 *189V *189W 192 *192A 194 *194A 197 198 201 202

*Indicates newly designated page