# 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

(License Amendment Request Dated April 23, 1976)

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.

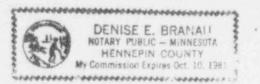
This request contains no restricted or other defense information.

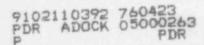
NORTHERN STATES POWER COMPANY

S. Q. Hackter J Wachter

Vice President, Power Production & System Operation

On this <u>23rd</u> day of <u>April</u>, <u>1976</u>, 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 conten's 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.





#### EXHIBIT A MONTICELLO NUCLEAR GENERATING PLANT DOCKET NO. 50-263

# LICENSE AMENDMENT REQUEST DATED APRIL 23, 1976

## PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS APPENDIX A OF PROVISIONAL OPERATING LICENSE NO. DPR-22

Pursuant to 10 CFR 50.39, the holders of provisional operating license DPR-22 hereby propose the following changes to Appendix A Technical Specifications:

#### PROPOSED CHANGES

# T.S. 3.11/4.11.A, B and C (Pages 189B, C and D)

Replace the current pages with those included in attached Exhibit B. Changes are indicated with sidelining. Note that the MCPR limits proposed are those submitted in the "License Amendment Request Dated December 1, 1975" which is expected to be issued imminently.

# T.S. 3.11 and 4.11 Bases (Pages 189E, F and G)

Replace the current pages with those included in attached Exhibit B. Changes are indicated with sidelining.

# Figures 3.11.1-A and E (Formerly Pages 189H and L)

Delete former Figure 3.11.1-A (page 189H) "MAPLHGR vs Plans: Average Exposure, Monticello 7D225 Fuel". Change the number of former Figure 3.11.1-E (page 189L) "MAPLHGR vs Planar Average Exposure, Monticello 8D219 Fuel" to 3.11.1-A and shift it to page 189H.

#### Figure 3.11.2 (Page 189L)

Insert the new Figure 3.11.2, "LHGR vs Core Height", on the page 189L which was vacated by the above change.

## Former Figure 3.11.2 (Page 189M)

Change the number of the figure entitled Factor versus Percent of Rated Core Flow" from Figure 3.11.2 to Figure 3. 1.3

# REASON FOR CHANGES

A February 25, 1976 letter from Mr D L Ziemann (USNRC) to Mr L O Mayer (NSP) requested that a standardized version of Specifications 3.11 and 4.11, Fuel Rods, be adopted. This submittal takes exception to the following aspects of the standard version:

- The standard version specifies limiting conditions for operation on APLHGR, LHGR and MCPR which are applicable "during power operation". The limits specified are steady state values which are selected with sufficient margin such that they can safely be exceeded during operational transients. The requested changes clearly state that the LCO's apply to steady state operation.
- The standard version references "normal surveillance" in specifying action to be taken. These words have been omitted because they are unnecessary, undefined and ambiguous.
- 3. It is proposed that the term "Operating MCPR Limit" continue to be embodied in specification 3.11.C of the Monticello Technical Specifications. The numerical limits are only listed in 3.11.C; all other references refer to the "Operating MCPR Limit". As MCPR limits change from one reload to another, the corresponding Technical Specification change can be made very simply. To remove this definition would needlessly complicate this and future changes.
- The standard version of specification 4.11.C references 4. "limiting control rod patterns" as an action level for initiating surveillance. This term, we understand, has recently been defined in the Standardized Technical Specifications as "A limiting control rod pattern is a pattern which results in the core being on a thermal hydraulic limit; i.e., operating on a limiting value for APLHGR, LHGR or MCPR". The concept of a "limiting control rod pattern" used in the Monticello FSAR, Reload Safety Evaluations, Technical Specifications and other references is grossly different. The Monticello 3.3/4.3.B.5 Bases state "...during reactor operation with certain limiting control rod patterns, the withdrawal of a designated single control rod could result in one or more fuel rods with MCPR's below the Safety Limit (T.S.2.1.A). During use of such patterns, it is judged that testing of the RBM system prior to withdrawal of such rods to assure operability will assure that improper withdrawal does not occur". In summary, the STS definition pertains to an Operating Limit while the historical definition pertains to a Safety Limit. To avoid this point of confusion, the intent of the STS definition has been included in proposed specification 4.11.C without using the term "limiting control rod pattern".
- 5. The last two sentences of 3.11.A and B and the identical sentences of 3.11.C are proposed in the reversed order of the standardized version to correspond to the order in which the required action is to be taken.

#### SAFETY EVALUATION

This change was prompted by an effort of standardization and has only very remote implications on the safe operation of the plant. The thermal limits on fuel rods remain unchanged. Action levels have been more clearly defined. The Monticello

specifications were initially proposed based on a reasonable balance between surveillance requirements and reporting requirements. This change represents a slight shift toward increased reporting and decreased surveillance requirements. It will make the requirements of Monticello uniform with other similar reactors.

#### PROPOSED CHANGES

#### Table of Contents pages vii and viii

Replace the current pages with those included in Exhibit B. Changes are indicated with sidelining.

#### REASON FOR CHANGES

These changes incorporate the above revisions to the figures in section 3.11/4.11.

## EXHIBIT B

2.00

# LICENSE AMENDMENT REQUEST DATED APRIL 23, 1976

Exhibit B, attached, consists of the following revised pages of the Appendix A Technical Specifications which incorporate the proposed changes:

2.