



Northern States Power Company

Monticello Nuclear Generating Plant
2807 West Hwy 75
Monticello, Minnesota 55362-9637

November 14, 1995

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

10 CFR Part 50
Section 50.90

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

November 14, 1995 Supplement to License Amendment Request Dated August 15, 1995
Main Steam Isolation Valve and Appendix J Leak Test Requirements

In our License Amendment Request dated August 15, 1995, Monticello proposed changes to section 3.7/4.7.A, Primary Containment. A major portion of this proposed amendment was to remove prescriptive information concerning the primary containment leakage rate testing program and replace it with statements to abide by the requirements of Appendix J of 10 CFR Part 50.

Since that time, Regulatory Guide 1.163 was issued providing guidance on how to implement the newly approved Option B to 10 CFR Part 50, Appendix J which allows performance based testing. Accordingly, we are providing supplemental information to our August 15, 1995 submittal to incorporate the requirements of Option B, Section III.A for Type A testing (primary containment integrated leakage rate testing).

Exhibit A contains a description of the proposed changes, the reasons for requesting the changes, Safety Evaluations, and a Determination of Significant Hazards Consideration, and Environmental Assessment. Exhibit B contains the current Technical Specification pages marked up with the proposed change. Exhibit C contains revised Monticello Technical Specification pages.

The original change was proposed as a Cost Beneficial Licensing Action (CBLA). Adopting Option B will further reduce the cost of operating the Monticello plant as under Appendix J Option B, based on good prior test results, containment integrated leakage rate tests (ILRT) will not be required as often. With this proposed amendment, our next ILRT scheduled for the April 1996 refueling outage can be delayed.

This submittal contains no new NRC commitments, nor does it modify any prior commitments. Please contact Sam Shirey, Sr Licensing Engineer, at (612) 295-1449 if you require additional information related to this request.

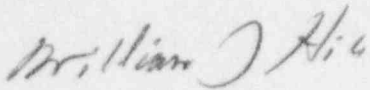
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November 14, 1995
Page 2

NORTHERN STATES POWER COMPANY



William J Hill
Plant Manager
Monticello Nuclear Generating Plant

c: Regional Administrator-III, NRC
NRR Project Manager, NRC
Resident Inspector, NRC
State of Minnesota
Attn: Kris Sanda
J Silberg

Attachments: Affidavit to the US Nuclear Regulatory Commission
Exhibit A - Evaluation of Proposed Change
Exhibit B - Technical Specification pages marked up with proposed
change
Exhibit C - Revised Monticello Technical Specification Pages

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

REQUEST FOR AMENDMENT TO
OPERATING LICENSE DPR-22

November 14, 1995 SUPPLEMENT TO LICENSE AMENDMENT REQUEST DATED
August 15, 1995

Northern States Power Company, a Minnesota corporation, requests authorization for changes to Appendix A of the Monticello Operating License as shown on the attachments labeled Exhibits A, B, and C. Exhibit A describes the proposed changes, describes the reasons for the changes, and contains a Safety Evaluation, a Determination of Significant Hazards Consideration and an Environmental Assessment. Exhibit B contains current Technical Specification pages marked up with the proposed changes. Exhibit C is a copy of the Monticello Technical Specifications incorporating the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By William J Hill

William J Hill
Plant Manager

Monticello Nuclear Generating Plant

On this 14th day of November 1995 before me a notary public in and for said County, personally appeared William J Hill, Plant Manager, Monticello Nuclear Plant, and being first duly sworn acknowledged that he is authorized to execute this document on 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.

Marvin R. Engen
Marvin R. Engen

Notary Public - Minnesota
Sherburne County

My Commission Expires January 31, 2000

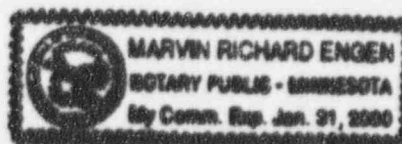


Exhibit A

MONTICELLO NUCLEAR GENERATING PLANT

November 14, 1995 Supplement to License Amendment Request Dated August 15, 1995

Evaluation of proposed changes to the Technical Specifications
for Operating License DPR-22

Pursuant to 10 CFR Part 50, Section 50.59 and 50.90, the holders of Operating License DPR-22 hereby propose the following changes to the Monticello Technical Specifications:

Proposed Change (Part 1)- Combined MSIV Leakage:

No change from original submittal.

Proposed Change (Part 2) - Drywell spray header and nozzle air test frequency:

No change from original submittal.

Proposed Changes (Part 3)- Utilization of Appendix J, Option B test interval criteria for Primary Containment:

In our original August 15, 1995 amendment request, changes were proposed to Monticello Technical Specification section 3/4.7.A.2 (Primary Containment), concerning the primary containment leakage rate testing program. These changes were to replace existing requirements with statements to abide by the requirements of Appendix J of 10 CFR Part 50. On September 26, 1995, Option B to Appendix J was approved and Regulatory Guide 1.163 was issued. This submittal revises changes proposed in our August 15, 1995 License Amendment Request to allow performance based testing as proposed in 10 CFR Part 50, Appendix J, Option B, Section III.A for Type A tests (primary containment integrated leakage rate tests). Consequently, the changes presented below are based on our August 15, 1995 submittal, and incorporate the guidance of Regulatory Guide 1.163.

On page 159, section 3.7.A.2.b.2, the words "maximum flow path" are being added. Also on page 159, section 4.7.A.2.b, which had been changed in our August 15, 1995 submittal, is being replaced with the following words:

"Perform required visual examinations and leakage rate testing for Type A containment integrated leakage rate tests in accordance with Regulatory Guide 1.163, and Type B and C tests in accordance with 10 CFR 50, Appendix J, Option A, as modified by approved exemptions."

On page 160, section 4.7.A.2.b.5 proposed words from our August 15, 1995 submittal are being replaced with "deleted".

At the bottom of page 184, the statement "NEXT PAGE IS PAGE 188" is being deleted.

Page 185 is being added as BASIS information.

Reason for Changes:

This revision incorporates wording as proposed by the NRC in letter "PROPOSED TECHNICAL SPECIFICATIONS TO ACCOMMODATE THE CHANGES TO APPENDIX J TO 10 CFR 50" dated July 18, 1995 from Christopher I. Grimes, to the four Owners Group Chairmen. As Monticello presently has Custom Technical Specifications rather than the Improved Standard Technical Specifications (STS), and Option B, Section III.A only is being adopted at this time, the wording matchup is not exact. It is, however, our intent that the proposed wording be as near the STS as practical.

As proposed in the above mentioned letter, we have elected to take the NRC's Surveillance Requirement (SR) approach to Option B, Section III.A at this time as it should result in a simpler change while still meeting the intent of Option B. Monticello has a containment Integrated Leak Rate Test (ILRT) scheduled for our April 1996 refueling outage. Approval of this amendment prior to April would preclude the necessity of a specific ILRT exemption submittal, and thus save both NSP and NRC the time and resources associated with a specific exemption request.

On page 159, the changes are as in our August 15, 1995 submittal, except for changes incorporating the requirements to comply with Regulatory Guide 1.163 for type A testing only, and to add the words "maximum flow path" for consistency. These new changes for Type A tests are as proposed by the NRC's July 18, 1995 letter "PROPOSED TECHNICAL SPECIFICATIONS TO ACCOMMODATE THE CHANGES TO APPENDIX J TO 10 CFR 50".

On page 160, the prescriptive requirements for MSIV testing that was proposed in our August 15, 1995 submittal has been changed to "deleted". The leakage rate limit and test pressure requirements are already adequately defined on page 159, Section 3.7.A.2.b.3, using nearly the same words being deleted here, therefore, this change is merely reducing duplication.

On page 184, information is being added as a new page 185, therefore, the next page is 185, not 188.

Page 185 is being added to describe the endorsement of 10 CFR 50, Appendix J, Option B, Section III.A for Type A primary containment integrated leakage rate tests.

Safety Evaluation:

This supplemental amendment invokes Section III.A of Option B, of 10 CFR 50, Appendix J which is based on the premise that the activities of the Regulatory Improvement Program should result in enhanced regulatory focus in areas that are more safety significant. As a result, an overall net increase in safety is expected from the program. The new performance-based regulation will be less prescriptive and will allow Monticello the flexibility to adopt cost-effective methods for implementing the safety objectives of the original rule. Therefore, this amendment does not introduce any new safety concerns.

Monticello Nuclear Generating Plant proposes to adopt the provisions of Appendix J, Option B, for Type A, primary reactor containment integrated leakage rate testing. The provisions of Option B will be implemented in accordance with Regulatory Guide 1.163, Performance Based Containment Leak-Test Program. Type B and C primary reactor containment leakage rate testing will be performed in accordance with the requirements of 10 CFR 50 Appendix J, Option A as they have been in the past.

Determination of Significant Hazards Consideration:

This proposed change to the Operating License has been evaluated to determine if it constitutes a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

- a. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes contained in this supplement to Monticello's August 15, 1995 amendment are limited to changes to surveillance testing requirements applicable to 10 CFR Part 50, Appendix J test requirements. Performance of the tests themselves are not input or consideration in any accident previously evaluated, thus the proposed change will not increase the probability of any such accident occurring.

The proposed amendment will not adversely affect the function, operation, reliability or capability of the equipment to perform as required during an accident. This change does not alter either how actual testing is accomplished nor the test acceptance criteria. It has been shown that adopting longer test intervals based on performance, maintains the safety objective for containment integrity while at the same time reducing the burden on licensees, and provides a greater level of worker safety than that provided by the previous rule.

Therefore, there will be no increase in post accident off-site or on-site radiation dose as a result of this amendment. The proposed amendment requires compliance with the regulatory requirements of 10 CFR Part 50, Appendix J Option B, Section III.A, for Type A testing that has previously been reviewed by the NRC and found to be acceptable. Therefore, the amendment will not increase the consequences of any accident previously evaluated.

- b. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed amendment does not involve modifications to plant equipment or operating procedures, nor will it introduce any new equipment failure modes that have not been previously considered. The proposed amendment is limited to changes in surveillance test frequencies of tests performed while the plant is in cold shutdown when the associated equipment is not required to be operable. We therefore conclude the proposed changes will not create the possibility of a new or different kind of accident from any accident previously analyzed.

- c. The proposed amendment will not involve a significant reduction in the margin of safety.

Extending the intervals between containment integrated leakage tests as authorized by 10 CFR Part 50 Appendix J Option B does not change the acceptance criteria nor how testing is accomplished.

Based on these considerations, we conclude the proposed amendment will not involve a significant reduction in the margin of safety.

Based on the evaluation described above, and pursuant to 10 CFR Part 50, Section 50.91, Northern States Power Company has determined that operation of the Monticello Nuclear Generating Plant in accordance with the proposed license amendment request does not involve any significant hazards considerations as defined by NRC regulations in 10 CFR Part 50, Section 50.92.

Environmental Assessment:

Northern States Power has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration,
2. The changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or
3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR Part 51 Section 51.22(c)(9). Therefore, pursuant to 10 CFR Part 51 Section 51.22(b), an environmental assessment of the proposed changes is not required.