

Exhibit B

Monticello Nuclear Generating Plant

License Amendment Request Dated November 14, 1995

Technical Specification Pages Marked Up  
with Proposed Wording Changes

Exhibit B consists of the existing Technical Specification pages marked up with the proposed changes. Existing pages affected by this change are listed below:

Page

159

160

184

185 (new)

Combined maximum flow path leakage

### 3.0 LIMITING CONDITIONS FOR OPERATION

b. When Primary Containment Integrity is required, leakage rates shall be limited to:

1. An overall integrated leakage rate of less than or equal to  $L_a$ , 1.2 percent by weight of the containment air per 24 hours at  $P_a$ , 42 psig. Maximum flow path
2. A combined leakage rate of less than or equal to  $0.6L_a$  for all penetrations and valves, ~~except for main steam isolation valves,~~ subject to Type B and C tests when pressurized to  $P_a$ , 42 psig.
3. Less than or equal to ~~11.5~~<sup>46</sup> scf per hour for all ~~any one~~<sup>age</sup> main steam isolation valves when tested at 25 psig.

With the measured overall integrated primary containment leakage rate exceeding  $0.75L_a$ , or the measured combined leakage rate for all penetrations and valves, ~~except main steam isolation valves,~~ subject to Type B and C testing exceeding  $0.6L_a$ , or the measured leak rate exceeding ~~11.5~~<sup>46</sup> scf per hour for ~~any one~~<sup>all</sup> main steam isolation valves, restore leakage rates to less than or equal to these values prior to increasing reactor coolant system temperature above  $212^\circ\text{F}$  or, alternatively, restore measured leakage rates to within these limits within one hour or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours.

Combined maximum flow path

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.

### 4.0 SURVEILLANCE REQUIREMENTS

~~b. The primary containment leakage rates shall be demonstrated at the following in accordance with the test schedule and shall be determined in conformance with the criteria, methods and provisions of 10 CFR Part 50; Appendix J as modified by approved exemptions.~~

1. ~~Three Type A overall integrated containment leakage rate tests shall be conducted at  $40 \pm 10$  month intervals\* during shutdown at  $P_a$  during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection.~~

2. ~~If any periodic Type A test fails to meet  $0.75L_a$ , the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet  $0.75L_a$ , a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet  $0.75L_a$ , at which time the above test schedule may be resumed.~~

3. ~~All Type A test leakage rates shall be calculated using observed data converted to absolute values. Error analyses shall be performed to select a balanced integrated leakage measurement system.~~

~~\*The second test of the second 10-year service period may be conducted during the 1989 refueling outage.~~

3.0 LIMITING CONDITIONS FOR OPERATION

4.0 SURVEILLANCE REQUIREMENTS

~~Deleted~~

4. ~~The accuracy of each Type A test shall be verified by a supplemental test which:~~
- ~~a. Confirms the accuracy of the test by verifying that the difference between the supplemental data and the Type A test data is within 0.25La, and~~
  - ~~b. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test, and~~
  - ~~c. Requires the rate of gas injected into the containment or bled from the containment during the supplemental test to be limited between 75 to 125% of La.~~

~~Deleted~~

5. ~~Type B and C tests shall be conducted with gas at  $> P_a$  at each refueling shutdown (maximum interval of 24 months), except for tests involving the main steam line isolation valves. Main steam isolation valve tests shall be conducted with gas at  $> 25$  psig each 48 months. A combined leakage rate of  $< 0.6L_a$  shall be demonstrated for all penetrations and valves, except for main steam line isolation valves, subject to Type B and C tests. A leakage rate of  $< 11.5$  scf per hour shall be demonstrated for each main steam line isolation valve. all~~

~~Combined maximum flow path~~

Bases Continued:

While the design of the Monticello plant predates 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," testing substantially conforms to the requirements of Appendix J. The design of the plant was thoroughly reviewed to determine where compliance with Appendix J was impossible or impractical. In each case where a departure from the requirements of Appendix J was identified, a request for exemption from the requirements of Appendix J or a plant modification was proposed and submitted for NRC Staff review. Exemptions were proposed in those cases where compliance with Appendix J would have provided no meaningful improvement in plant safety.

In their review of Appendix J compliance<sup>(1)</sup>, the NRC Staff approved a number of exemption requests, denied others, and provided necessary interpretation and clarification of the requirements of Appendix J. The Technical Specification surveillance requirements reflect the results of this review.

Exemption from the requirements of Appendix J was provided in the following areas:

- a. Testing of valves sealed by water
- b. Low pressure testing of main steam line isolation valves
- c. Low pressure testing of the primary containment airlock
- d. Reduced airlock testing frequency when the airlock is in frequent use

The Monticello airlock is tested by pressurizing the space between the inner and outer doors. Individual door seal leakage tests cannot be performed. Since the inner door is designed to seat with containment pressure forcing the door closed, special bracing must be installed for each leakage test. The outer door must be opened to install and remove this bracing. Because of the complexity of this operation, up to 24 hours may be necessary to perform a leakage test.

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(1) Letter from D G Eisenhut, Director, Division of Licensing, USNRC, dated June 3, 1984, "Safety Evaluation by the Office of NRR, Appendix J Review".

ADDED

Bases Continued:

On September 26, 1995, Regulatory Guide 1.163 became effective providing guidance on performance based testing to the requirements of 10 CFR 50, Appendix J, Option B. Monticello has adopted Option B, Section III.A of 10 CFR Part 50, Appendix J, for Type A primary reactor containment integrated leakage rate testing. Monticello will continue to perform Type B and C testing in accordance with 10 CFR Part 50, Appendix J, Option A.

Exhibit C

Monticello Nuclear Generating Plant

License Amendment Request Dated November 14, 1995

Revised Monticello Technical Specification Pages

Exhibit C consists of revised Technical Specification pages that incorporate the proposed changes. The pages included in this exhibit are as listed below. Note that due to removal of specific material and the resulting reconciliation, page 161 is no longer included.

Page

159

160

184

185 (new)

### 3.0 LIMITING CONDITIONS FOR OPERATION

b. When Primary Containment Integrity is required, leakage rates shall be limited to:

1. An overall integrated leakage rate of less than or equal to  $L_a$ , 1.2 percent by weight of the containment air per 24 hours at  $P_a$ , 42 psig.
2. A combined maximum flow path leakage rate of less than or equal to  $0.6L_a$  for all penetrations and valves, subject to Type B and C tests when pressurized to  $P_a$ , 42 psig.
3. Less than or equal to 46 scf per hour combined maximum flow path leakage for all main steam isolation valves when tested at 25 psig.

With the measured overall integrated primary containment leakage rate exceeding  $0.75L_a$ , or the measured combined leakage rate for all penetrations and valves subject to Type B and C testing exceeding  $0.6L_a$ , or the measured combined maximum flow path leakage rate exceeding 46 scf per hour for all main steam isolation valves, restore leakage rates to less than or equal to these values prior to increasing reactor coolant system temperature above 212°F or, alternatively, restore measure leakage rates to within these limits within one hour or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours.

3.7/4.7

### 4.0 SURVEILLANCE REQUIREMENTS

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

1. Deleted
2. Deleted
3. Deleted
4. Deleted
5. Deleted

### 3.0 LIMITING CONDITIONS FOR OPERATION

c. When Primary Containment Integrity is required, the primary containment airlock shall be operable with:

1. Both doors closed except when the airlock is being used, then at least one airlock door shall be closed, and
2. An overall airlock leakage rate of less than or equal to 0.05La at Pa or 0.007La at 10 psig.

With the primary containment airlock inoperable, maintain at least one airlock door closed and restore the airlock to Operable status within 24 hours or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours.

### 4.0 SURVEILLANCE REQUIREMENTS

c. The primary containment airlock shall be demonstrated operable:

1. By performing overall airlock leakage rate testing in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions.
2. Deleted
3. At six month intervals by verifying that only one door can be opened at a time. If the airlock has not been used since the last door interlock test, this test is not required.

d. The interior surfaces of the drywell shall be visually inspected each operating cycle for evidence of deterioration.

Bases Continued:

While the design of the Monticello plant predates 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," testing substantially conforms to the requirements of Appendix J. The design of the plant was thoroughly reviewed to determine where compliance with Appendix J was impossible or impractical. In each case where a departure from the requirements of Appendix J was identified, a request for exemption from the requirements of Appendix J or a plant modification was proposed and submitted for NRC Staff review. Exemptions were proposed in those cases where compliance with Appendix J would have provided no meaningful improvement in plant safety.

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(1) Letter from D G Eisenhut, Director, Division of Licensing, USNRC, dated June 3, 1984, "Safety Evaluation by the Office of NRR, Appendix J Review".

Bases Continued:

On September 26, 1995, Regulatory Guide 1.163 became effective providing guidance on performance based testing to the requirements of 10 CFR 50, Appendix J, Option B. Monticello has adopted Option B, Section III.A of 10 CFR Part 50, Appendix J, for Type A primary reactor containment integrated leakage rate testing. Monticello will continue to perform Type B and C testing in accordance with 10 CFR Part 50, Appendix J, Option A.