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September 25, 1998

10 CFR 50.71(e)

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

# MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263 License No. DPR-22

# PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Docket Nos. 50-282 License Nos. DPR-42 50-306 DPR-60

## Semiannual Status Update on Project Plans for USAR Review Project and Conversion to Improved Technical Specifications (ITS)

Reference: 1) Letter from M D Wadley, VP Nuclear Generation, Northern States Power Company to USNRC Document Control Desk, dated September 26, 1997, "Project Plans for USAR Review Project and Conversion to Improved Technical Specifications (ITS)"

In September, 1997, NSP provided the following commitments:

- (1) Prairie Island plans to complete its USAR Review Project in December of 2001.
- (2) Monticello plans to complete its USAR Review Project in June of 2001.
- (3) Prairie Island plans to provide an Improved Technical Specification conversion package submittal to the NRC in October of 1999.
- (4) Monticello plans to provide an Improved Technical Specification conversion package submittal to the NRC in June of 2000.

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### PRAIRIE ISLAND USAR REVIEW PROJECT

#### Target milestone summary:

# Phase I; Draft document completed by 12/31/97

As reported in the last update report, the draft document had not been completed on 12/31/97. The draft document has been completed and was distributed to System Engineers and subject matter experts for review. Comments were then resolved and factored into the draft document.

### Phase I; Final document completed by 6/30/98

The final document was not completed on 6/30. For changes to the USAR that are not editorial, safety evaluations were prepared and reviewed. Many comments by reviewers were aimed at improving and clarifying sections of the USAR. Although these concerns are scheduled to be addressed in future phases of the project, some of them are being addressed now. This is extending the completion date of Phase I. In support of the proposed changes to the USAR, 39 safety evaluations were prepared. At this time, 31 safety evaluations have been reviewed and approved and 8 safety evaluations are in the final review. Packages for editorial changes are also being prepared. The current estimate for completion of the document is 11/30/98. A revision to the USAR will be made shortly thereafter.

There are two Sections of the USAR that are not included in the above discussion. Section 14 is being revised and reformatted, as well as related Appendices B and C. These changes will present information in a more logical format. This effort includes support from the corporate Nuclear Analysis Department and will extend past the 9/30/98 milestone. The projected completion date is 11/15/98. The other Section that will not be completed by 9/30/98 is Appendix I. Much of the information in this appendix is being reviewed, and possibly revised, under a separate project. Therefore, Appendix I will not be in the scope of the USAR project.

There were some other significant activities that took place during the past six months. A conscious effort was made to train the USAR Project team in the philosophy, content and writing of 50.59 evaluations. The plant administrative procedure was the basis for the content of the training. After that, selected draft safety evaluations prepared by team members were reviewed by the rest of the team. This ensured the team was taking a consistent approach to development of safety evaluations.

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A subcommittee of the plant's Operations Committee was formed to perform an initial review of the safety evaluations for the changes to the USAR. Due to the large number of safety evaluations involved, it was felt that an initial review would be beneficial to maintain consistency. The safety evaluations, along with the subcommittee meeting minutes, are then distributed and reviewed by the Operations Committee.

#### Phase II

The scope of Phase II has been expanded. Initially, Phase II was to verify the accuracy of the USAR. That scope will now include a review to ensure completeness. An Implementation Plan will be developed to review the USAR for completeness against such documents as Generic Letter responses, Information Bulletin responses, NRC orders, etc. This review is intended to determine if any information developed in response to any of these documents should have been reflected in the USAR. The increase in scope will necessitate a change to the Phase II milestone schedule, as follows:

Phase IIA (accuracy) 3/31/00 Phase IIB (completeness) 3/31/00

Other activities related to the USAR Project:

Prairie Island continues to have a member participating on the NEI Task Force for developing guidance for SAR Updates, NEI 98-03.

# MONTICELLO USAR REVIEW PROJECT

Target milestone summary:

Phase I Subject Matter Expert Reviews are complete. Phase II Part A (Comprehensive Review) will be completed by 6/30/00. Phase II Part B (Issue Resolution) will be completed by 6/30/01.

Ongoing activities:

USAR issues identified during the review process and daily activities are being documented and processed. Condition reports are being screened, assessed for operability and reportability, and corrective actions are being implemented.

Other activities related to the USAR Project:

- Phase I is complete. All USAR sections have been reviewed by a Subject Matter Experts.
- Phase II has begun with the review of historical Generic Letters and Bulletins for applicability to Monticello's USAR.

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Other activities related to the USAR Project: (continued)

- Emphasis is being placed on resolving issues found during Phase I reviews. Most of the project resources will be devoted to resolution of these issues during the fourth quarter.
- The USAR periodic revision in accordance with 10CFR50.71(e) will be submitted in October. The USAR revision incorporating power rerate changes will be submitted 9 months after the power accession testing is completed. Both of these revisions will include resolved issues found during this project.
- Continue to participate on the NEI Design Basis Task Force developing the Design Basis guidance document NEI 97-04 and the BWROG Design Basis/ USAR information exchange committee. Also, stayed informed on NEI/NRC progress on the USAR guidance document NEI 98-03.

### PRAIRIE ISLAND ITS PROJECT

Target Submittal:

NSP plans to submit the ITS conversion package in October of 1999.

Ongoing Activities:

- 1.0 Definitions
- 2.0 Safety Limits
- 3.0 LCO/SR Applicability
- 3.1 Reactivity Control Systems
- 3.2 Power Distribution Limits
- 3.3 Instrumentation
- 3.4 RCS
- 3.5 ECCS
- 3.6 Containment
- 3.7 Plant Systems
- 3.8 Electrical Power Systems
- 3.9 Refueling Operations
- 4.0 Design Features
- 5.0 Administrative Controls

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## MONTICELLO ITS PROJECT

### Target Submittal:

NSP has committed to submit the ITS conversion package by June of 2000 and complete the project by June of 2001. However, a six month extension is currently being considered. Any actual change to this commitment will be the subject of separate correspondence.

#### **Ongoing Activities:**

Licensing has converted the current Tech Specs onto INTERLEAF document software. Preliminary preparations, research and ITS Project administrative procedure preparation continue.

Please contact Mark McKeown (612-330-6989) if you have any questions related to this letter.

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