

Northern States Power Company



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

July 30, 1998

**US Nuclear Regulatory Commission** Attn: Document Control Desk Washington, DC 20555

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

Supplementary Information Regarding the Monticello Power Rerate (TAC No. 96238)

#### Commitments

- Ref. 1 Letter from M.F. Hammer, NSP, to US NRC Document Control Desk, "Revision 1 to License Amendment Request Dated July 26, 1996 Supporting the Monticello Nuclear Generating Plant Power Rerate Program," December 4, 1997
- Ref. 2 Letter from M.F. Hammer, NSP, to US NRC Document Control Desk, "Submittal of Supplemental Information and Identification of Commitments for Monticello Power Rerate Program," April 8, 1998

By Exhibit H of a letter dated December 4, 1997 (Ref. 1) and Attachment 3 of a letter dated April 8, 1998 (Ref. 2), NSP provided a list of license commitments associated with the Monticello power rerate program. A number of these commitments have since been completed. To update and consolidate the power rerate commitments, NSP is providing a revised list as Attachment 1 to this letter. No new commitments are proposed. A list of completed commitments is provided as Attachment 2. NSP recognizes that the revised list of commitments contained in Attachment 1 will be incorporated into the Monticello Operating license, DPR-22, as license conditions.

#### Compliance

On July 24, 1998, NSP and the NRC staff held a conference call regarding the effect of power rerate on regulatory compliance. NSP discussed the methods used to assure that the impact of power rerate on regulatory compliance is accounted for and also discussed recent related activities. Staff requested that NSP provide a written record of this conversatior. Accordingly, documentation of said conference call is provided below.

As described in Section 11.1 of the power rerate license amendment request dated December 4, 1997, NSP has a program in place to assure that the analysis, design, and implementation of the Monticello power rerate is in compliance with regulatory requirements. As part of this 10011

9808120102 PDR ADOCK

program, NSP periodically evaluates the impact of the power rerate on regulatory compliance in light of new NRC regulatory requirements, industry communications, and plant unique items. This periodic evaluation will continue until power rerate is implemented.

In response to a recent staff inque, NSP has confirmed that for the period including the startup from the last refueling outage to July 1, 1998, the power rerate is in compliance with regulatory requirements. NSP employed the methodology described in Section 11.1 to support this confirmation. In addition, all condition report open items were examined, and no new rerate sensitivities were identified. NSP also confirmed that as of July 24, 1998, all plant equipment was operable, and no known non-compliances existed. NSP will continue to evaluate the effect of power rerate on equipment operability as part of its rerate compliance program.

#### Implementation of Power Rerate

In regard to the technical specifications changes associated with power rerate, NSP requests a period of up to 90 days following the receipt of the rerate license amendments to implement the changes.

This submittal provides supplemental information to NSP's power rerate license amendment request (Ref. 1). This information does not affect the determination of no significant hazards that is included within the amendment request. Please contact Joel Beres at 612-295-1436 if additional information is required.

M NOath for

Michael F. Hammer Plant Manager Monticello Nuclear Generating Plant

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

Attachments

Affidavit to the Nuclear Regulatory Commission Attachment 1 Power Rerate License Commitments Attachment 2 Completed Power Rerate License Commitments

#### UNITED STATES NUCLEAR REGULATORY COMMISSION

## NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

## Supplementary Information Regarding the Monticello Power Rerate (TAC No. 96238)

Northern States Power Company, a Minnesota corporation, by letter dated July 30, 1998 provides supplemental information to the US Nuclear Regulatory Commission (NRC) regarding the Monticello power rerate. This letter contains no restricted or other defense information.

#### NORTHERN STATES POWER COMPANY

By

Marcus H. Voth Licensing Project Manager Monticello Nuclear Generating Plant

On this <u>30</u> day of <u>July</u> <u>1998</u> before me a notary public in and for said County, personally appeared Marcus H. Voth, Licensing Project Manager, Monticello Nuclear Generating Plant, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, and that to the best of his knowledge, information, and belief the statements made in it are true.

Samuel I. Shirey Notary Public - Minnesota Sherburne County



Attachment 1

.

. . .

.

.

Power Rerate License Commitments

#### A. The following items will be completed prior to implementation of power rerate.

1) All affected environmental qualification files, including service life and maintenance intervals if necessary, will be revised to reflect the new environmental profile changes associated with power rerate.

2) All affected process computer and SPDS data points will be changed to reflect rerate operating conditions.

- 3) The following changes to the Monticello training program will be implemented.
  - a. Simulator changes will be completed in accordance with ANSI/ANS 3.5 1985 section 5.4.1 simulator performance testing and Monticello simulator configuration control procedures.
  - b. Classroom and simulator training on new knowledge and abilities associated with the power rerate will be provided in accordance with Monticello Training Center procedures.
- B. The following items will be completed during and after the power rerate ascension test program.

1) Feedwater and Condensate System area ambient temperatures will be monitored at rerate conditions to confirm that design temperatures are not exceeded.

2) Feedwater and Condensate System testing will be conducted as described by NSP's response to Question 17 contained in NSP's power rerate submittal dated March 26, 1998.

3) The adequacy of the Service Water System will be confirmed by monitoring the system and its loads.

- 4) The moisture separator drain system stability will be monitored.
- NSP will monitor the plant for rerate impacts on the PRA models.
- C. The following item will be completed within 3 months of completion of the power rerate ascension test program.

Simulator changes will be verified against actual plant startup data.

D. The following item will be completed within 6 months of completion of the power rerate ascension test program.

The applicable training programs and the simulator will be modified, or appropriate compensatory actions will be taken, in accordance with the Monticello Training Center procedures to reflect issues and discrepancies identified during startup testing.

E. The following item will be completed within 9 months of completion of the power rerate ascension test program.

The MNGP USAR will be updated to reflect the changes associated with power rerate operation. This update will not include credit for suppression pool scrubbing in the MSIV leakage pathway in the revised LOCA analysis.

F. The following items will be completed by the end of the next scheduled refueling outage.

1) NSP will evaluate whether MO-2034 and MO-4229 are capable of allowing a subsequent operation after the required isolation safety functions are completed. This evaluation may include an examination of assumptions and methodologies, additional administrative controls, and modifications. The evaluation will be completed in order to institute the corrective actions, if any, by the end of the next scheduled refueling outage.

2) NSP will evaluate the capacity margins of MO-2398 and MO-2034. This evaluation may include an examination of assumptions and methodologies, additional administrative controls, and modifications. The evaluation will be completed in order to institute the corrective actions, if any, by the end of the next scheduled refueling outage.

Attachment 2

. .

. . .

**Completed Power Rerate License Commitments** 

Completed Commitments from Exhibits D and H of NSP's December 4, 1997 License Amendment Request

1) The piping support modifications described below are complete.

One spring hanger on a feedwater heater drain line has been replaced with a rigid support.

The RHR heat exchanger supports have been upgraded. One RHR spring can has been adjusted.

Non-safety related drain lines from each main steam line to the condenser were evaluated to ensure that a qualified path for MSIV leakage to the condenser exists during a seismic event. All drain lines and equipment within the scope of this evaluation were seismically verified. The evaluations show several new supports and modifications to the existing piping and equipment supports were required in order to limit piping displacements and to increase load carrying capacity of supports during a seismic event. The supports have been installed and the applicable modifications made.

- The confirmation that 45% of 1775 MWt (798.75 MWt) turbine trip bypass setpoint does not significantly affect the conclusions in Section III.E of Appendix A (of the December 4, 1997 letter) is complete.
- The calculation to confirm the conservatism of assumptions used in the evaluation of the impact of long-term heatup of the reactor building is complete.
- 4) The changes to the tap settings of the 1R source transformer and other affected in plant transformers are complete, and the new offsite voltage limits have been implemented as described in Exhibit I of NSP's power rerate license amendment request dated December 4, 1997. Load study validation tests have been performed that verified the performance of the new configuration.
- The empirical relation between turbine 1st stage pressure and percent reactor power for the new turbine has been determined.
- 6) The changes to the MNGP Erosion/Corrosion program described in Section 3.6 of NSP's power rerate license amendment request dated December 4, 1997 are complete.
- All plant changes described in Exhibit D of NSP's power rerate license amendment request dated December 4, 1997 have been completed with the following exceptions.

The instrumentation setpoint changes will be implemented upon staff approval of the license amendment request consistent with the rerate power ascension testing except for the changes to the Main Generator Protective Devices which are not necessary since these devices are already set to provide adequate protection at rerate conditions and the changes to the Demineralizer Flow Controllers which are complete.

8) Commitment 7 contained in Exhibit H of NSP's power rerate license amendment request dated December 4, 1997: "An evaluation of the potential for flow induced vibration will be done prior to exceeding any core flow limits as defined by the current version of Figure 5 of the Core Operating Limits Report," has been removed from the commitment list since the core flow limits will not be exceeded without prior NRC approval.

# Completed Commitments from Attachment 3 of NSP's Letter of April 8, 1998 Regarding MOVs

The condition reports concerning MOV evaluations described in NSP's response to Questions 1 and 2 have been initiated.

## Other

.

. . . . .

The following items were not previously cited as commitments but are included here for completeness.

The feedwater heaters have been analyzed and verified to be acceptable for the slightly higher feedwater heater temperatures and pressures for the 1775 MWt power rerate (Section 7.4 of Exhibit E. Ref. 1).

The plant emergency operating procedures (EOPs) have been reviewed for the effects of power rerate, and the EOPs have been updated (Section 11.1.4 of Exhibit E, Ref. 1).