

**From:** Kuntz, Robert  
**Sent:** Wednesday, March 23, 2022 1:35 PM  
**To:** Emanuelson, Mary A  
**Cc:** Scott, Sara  
**Subject:** Monticello Nuclear Generating Plant – Acceptance of VR-08 Re: Alternative to Adopt ASME OM Code Case OMN-28 (EPID: L-2022-LLR-0030)

Ms. Emanuelson,

By submittal dated March 7, 2022, Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, submitted VR-08 for Monticello Nuclear Generating Plant requesting an alternative for applying the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM) Code Case OMN-28 “Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation.” The purpose of this e-mail is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff’s acceptance review of this relief request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the Code of Federal Regulations (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

Based on the information provided in your submittal the NRC staff has estimated that this licensing request will take approximately 120 hours to complete. The NRC staff expects to complete this review in approximately 11 months, which is February 28, 2023. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff’s initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities.

If you have any questions, please contact me.

Robert F. Kuntz, Senior Project Manager  
Plant Licensing Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 1565

**Mail Envelope Properties** (SA9PR09MB4640BF6C11B44D7229607B2899189)

**Subject:** Monticello Nuclear Generating Plant – Acceptance of VR-08 Re: Alternative to Adopt ASME OM Code Case OMN-28 (EPID: L-2022-LLR-0030)  
**Sent Date:** 3/23/2022 1:35:23 PM  
**Received Date:** 3/23/2022 1:35:00 PM  
**From:** Kuntz, Robert

**Created By:** Robert.Kuntz@nrc.gov

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Tracking Status: None

**Post Office:** SA9PR09MB4640.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2583	3/23/2022 1:35:00 PM

**Options**  
**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**