From: Kuntz, Robert
Sent: Tuesday, May 3, 2022 2:01 PM
To: Loeffler, Richard A.
Cc: Scott, Sara
Subject: Request for Additional Information RE: Monticello Alternative VR-10, EFCV testing frequency

Mr. Loeffler:

By request dated March 7, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22067A083), Northern States Power Company (NSPM), a Minnesota corporation doing business as Xcel Energy (Xcel), submitted alternative request VR-10 for the inservice testing program for the testing of excess flow check valves at Monticello Nuclear Generating Plant.

The following requests for additional information (RAI) is needed for the Nuclear Regulatory Commission (NRC) staff to complete its review. During a clarification call conducted May 3, 2022 a response date of May 3, 2023 was agreed upon.

Robert Kuntz
Senior Project Manager
NRC/NRR/DORL/LPL3

REQUEST FOR ADDITIONAL INFORMATION

MONTICELLO NUCLEAR GENERATING PLANT

ALTERNATIVE VR-10 RELATED TO EXCESS FLOW CHECK VALVE TESTING

EMIB-RAI-1

Monticello Nuclear Generating Plant (Monticello) Alternative Request VR-10, Section "Full Description of Proposed Alternative," states that NEI 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies, Industry Guidance Document," Revision 1, dated April 2007 (ADAMS Accession No. ML071360456) addresses surveillances performed on a "Staggered Test Basis," in the risk assessment. The NRC staff understands that "Staggered Test Basis" is only used in Monticello Technical Specification (TS) 5.5.13, "Monticello Control Room Envelope Habitability Program." Explain and clarify the use of "Staggered Test Basis" for Surveillance Frequency Control Program (SFCP) specifically for the excess flow check valves (EFCVs).

EMIB-RAI-2

As precedents for Monticello Alternative Request VR-10, the request references a LaSalle County Station, Units 1 and 2 (LaSalle) request approved by the NRC in a letter dated July 3, 2018 (ADAMS Accession No. ML18163A054), and Peach Bottom Atomic Power Station, Units 2

and 3 (Peach Bottom) request approved by the NRC in a letter dated April 28, 2017 (ADAMS Accession No. ML17108A762). As discussed in the NRC safety evaluation, the LaSalle alternative requires that each EFCV be tested at least once every 10 years. As discussed in the NRC safety evaluation for the Peach Bottom request the alternative requires that each main steam isolation valve (MSIV) be tested every two years.

Monticello Alternative Request VR-10, Section "Full Description of Proposed Alternative," last paragraph, states, in part, that the proposed alternative allows the frequency for testing of the subject EFCVs under Surveillance Requirement (SR) 3.6.1.3.8 to be determined by applying the SFCP in accordance with NRC-approved NEI 04-10. The use of the SFCP or NEI 04-10 does not provide a maximum extension of the test interval in lieu of the ASME OM Code interval of 24 months for the EFCVs. Similar to the cited precedents, will there be a maximum test interval for each EFCV within the scope of the request? If so, what is that maximum test interval?

Hearing Identifier: NRR_DRMA
Email Number: 1621

Mail Envelope Properties (SA9PR09MB4640553C72ABEFE4F8A375E699C09)

Subject: Request for Additional Information RE: Monticello Alternative VR-10, EFCV testing frequency
Sent Date: 5/3/2022 2:01:21 PM
Received Date: 5/3/2022 2:01:00 PM
From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:
"Scott, Sara" <sara.scott@xcelenergy.com>
Tracking Status: None
"Loeffler, Richard A." <rick.a.loeffler@xcelenergy.com>
Tracking Status: None

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

Files	Size	Date & Time
MESSAGE	3078	5/3/2022 2:01:00 PM

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Priority: Normal
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