

From: Kuntz, Robert
Sent: Friday, June 24, 2022 11:55 AM
To: Emanuelson, Mary A
Cc: Scott, Sara
Subject: DRAFT RAI RE: Monticello Alternative VR-08

In a submittal dated March 7, 2022, Northern States Power Company, doing business as Xcel Energy (Xcel Energy, the licensee) submitted Alternative Request VR-08 for the Inservice Testing (IST) Program at Monticello Nuclear Generating Plant (Monticello), to the U.S. Nuclear Regulatory Commission (NRC) (Agencywide Documents Access and Management System Accession Nos. ML22067A084). The submittal is related to Code Case OMN-28. The Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review. The NRC staff's draft request for additional information (RAI) is included. If Xcel Energy requires clarification on the included draft RAI contact me to schedule a clarification discussion with the NRC staff. If no clarification is required then this draft RAI will be considered a formal RAI and a response within 30 days of this message would be expected.

Robert Kuntz
Senior Project Manager
NRC/NRR/DORL/LPL3
(301) 415-3733

DRAFT REQUEST FOR ADDITIONAL INFORMATION

MONTICELLO NUCLEAR GENERATING PLANT

ALTERNATIVE VR-08

EMIB-RAI-1:

Background: Alternative Request VR-08 proposes that ASME OM Code Case OMN-28 be implemented in lieu of the requirements in ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for the remote position verification of valves at Monticello.

Regulatory Requirements:

The NRC regulations in Section 55a, "Codes and standards," in Part 50, "Domestic Licensing of Production and Utilization Facilities," in Title 10, "Energy," of the *Code of Federal Regulations* (10 CFR 50.55a) in paragraph (z), "Alternatives to codes and standards requirements," state the following:

Alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation. A proposed alternative must be submitted and authorized prior to implementation. The applicant or licensee must demonstrate that:

- (1) *Acceptable level of quality and safety.* The proposed alternative would provide an acceptable level of quality and safety; or

(2) *Hardship without a compensating increase in quality and safety.* Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Issue:

Note 1 to the tables in Alternative Request VR-08 states that “OMN-28 may be applied to all valves in the IST program that meet OMN-28 requirements in the future.”

Request:

In that the NRC is being requested to authorize an alternative under 10 CFR 50.55a(z) to allow components to deviate from the 10 CFR 50.55a regulatory requirements, please identify the specific components by their ID numbers within the scope of Note 1 in Alternative Request VR-08.

Hearing Identifier: NRR_DRMA
Email Number: 1693

Mail Envelope Properties (SA9PR09MB464049F13C17863ACAFAB77799B49)

Subject: DRAFT RAI RE: Monticello Alternative VR-08
Sent Date: 6/24/2022 11:54:53 AM
Received Date: 6/24/2022 11:54:00 AM
From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:

"Scott, Sara" <sara.scott@xcelenergy.com>

Tracking Status: None

"Emanuelson, Mary A" <mary.emanuelson@xcelenergy.com>

Tracking Status: None

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

Files	Size	Date & Time
MESSAGE	2931	6/24/2022 11:54:00 AM

Options

Priority: Normal

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date: