



2807 West County Road 75
Monticello, MN 55089

August 29, 2022

L-MT-22-037
10 CFR 50.55a(z)(1)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket No. 50-263
Renewed Facility Operating License
No. DPR-22

Supplement to 10 CFR 50.55a Request Associated with the Monticello Sixth Inservice Testing Ten-Year Interval, Alternative VR-10, Excess Flow Check Valve Testing Frequency (EPID: L-2022-LLR-0031)

References:

1. NSPM web submission to the NRC, "10 CFR 50.55a Request Associated with the Monticello Sixth Inservice Testing Ten-Year Interval Alternative Related to Excess Flow Check Valve Testing Frequency," dated March 7, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22067A083)
2. NRC email to NSPM, "Request for Additional Information RE: Monticello Alternative VR-10, EFCV testing frequency" dated May 3, 2022 (ADAMS Accession No. ML22123A282)
3. NSPM letter to the NRC, "Response to a Request for Additional Information: Monticello Alternative VR-10, Excess Flow Check Valve Testing Frequency (EPID: L-2022-LLR-0031), dated May 25, 2022 (ADAMS Accession No. ML22145A588)
4. NRC letter, "Summary of July 26, 2022, Meeting with Northern States Power Company, Doing Business as Xcel Energy, Related to the Alternative Request for Excess Flow Check Valves at Monticello Nuclear Generating Plant (EPID: L-2022-LLR 0031)," dated August 3, 2022 (ADAMS Accession No. ML22208A195)

On March 7, 2022, the Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), submitted a request for a 10 CFR 50.55a(z)(1) alternative (VR-10) pertaining to the testing of Excess Flow Check Valves (EFCVs) under the inservice testing (IST) program for the Monticello Nuclear Generating Plant (Reference 1). On May 3, 2022, the U.S. Nuclear Regulatory Commission (NRC) requested additional information (RAI) be provided (Reference 2) and on May 25, 2022, NSPM provided the response (Reference 3).

On July 26, 2022, the NRC held a public meeting with the NSPM to discuss the response to the second RAI (EMIB-RAI-2) as described in Reference 4. NSPM is supplementing the response previously provided to EMIB-RAI-2 in Reference 3, based upon the discussion within

that meeting. The enclosure provides a revised response which supersedes the previous response to EMIB-RAI-2 with the change indicated by a revision bar. NSPM proposes a maximum surveillance frequency (maximum test interval) of 10 years based upon existing industry precedents for performing EFCV testing.

Summary of Commitments

This letter makes no new commitments and no revisions to existing commitments.

Should you have any questions or if additional information is needed, please contact Mr. Richard Loeffler at (612) 342-8981 or Rick.A.Loeffler@xcelenergy.com.



Shawn C. Hafen
Plant Manager, Monticello Nuclear Generating Plant
Northern States Power Company – Minnesota

cc: Administrator, Region III, US NRC
Project Manager, Monticello, US NRC
Resident Inspector, Monticello, US NRC

ENCLOSURE

SUPPLEMENT TO THE LICENSE AMENDMENT REQUEST

MONTICELLO NUCLEAR GENERATING PLANT

ALTERNATIVE VR-10 RELATED TO EXCESS FLOW CHECK VALVE TESTING

(1 page follows)

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ALTERNATIVE VR-10 RELATED TO EXCESS FLOW CHECK VALVE TESTING

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?

Revised Response

The SFCP does not impose any pre-defined limits on the surveillance frequency. A surveillance frequency change using the method defined under the SFCP has to be technically justifiable based in part on the performance history of the components and the system(s) associated with the test itself, past industry and plant-specific operating experience, and the risk analysis. The SFCP process expects that the next logical interval is selected. If it is not selected, then a basis is documented within the evaluation of the change. Once the test frequency change has been implemented, the SFCP requires periodic re-assessment based on the results of performance monitoring and feedback, which is intended to ensure that the testing being conducted can provide meaningful data and is sufficient to detect performance degradation. However, a maximum surveillance frequency (maximum test interval) of 10 years is proposed based upon existing industry precedents for performing EFCV testing.