

From: Robert Kuntz
Sent: Wednesday, January 4, 2023 9:11 AM
To: Jacobson, Ronald G.
Cc: michael.a.miller@xcelenergy.com; Brent Ballard
Subject: DRAFT Request for Additional Information RE: Monticello Nuclear Generating Plant Request PR 08, HPCI Pump Quarterly Testing

By request dated December 15, 2022, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22350A726), Northern States Power Company (NSPM), doing business as Xcel Energy (the licensee) submitted inservice testing (IST) Alternative request PR 08 for Monticello Nuclear Generating Plant (MNGP). Pursuant to Title 10 of *Code of Federal Regulations* (10 CFR) Section 50.55a(z)(2), the proposed alternative requests to defer the quarterly testing of components in the High Pressure Coolant Injection (HPCI) system until after the 2023 spring refueling outage when repairs to the 'G' SRV (Safety Relief Valve) will be completed. The Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review of the request. Include is a draft request for additional information (RAI). If Xcel Energy requires clarification on the included draft RAI contact me to schedule a discussion with the NRC staff to provide clarification. If no clarification is required then this draft RAI would be considered a formal RAI.

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

PROPOSED IST ALTERNATIVE REQUEST FOR HPCI PUMP QUARTERLY ALTERNATIVE
(PR 08)

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NUMBER 50-263

EPID NUMBER L-2022-LLR-0088

The requirements in 10 CFR 50.55a(z)(2) specifies that alternatives to the American Society for Mechanical Engineers Code (Code) requirements may be authorized if the Code requirements result in a hardship without a compensating increase in the level of quality and safety. For the NRC staff to determine that the request alternative meets the requirements the following information is required.

RAI-1:

The request includes a summary of the testing history for check valves HPCI-18, 20, 32, 9, and 10 for the last 10 years and indicates that the valves have no history of "failures." The request also states that several of the valves have been disassembled and inspected in the last 10 years. Discuss the testing history (rather than only failures) and the reason for disassembly and inspection of these check valves.

RAI-2:

The request indicates that MOV MO-2036 has 21% open capability margin. Provide the type of valve and actuator for MO-2036 and the assumptions for calculating the open margin.

RAI-3:

For HPCI pump P-209, the request states that the pump trending of flow/differential pressure, oil, and vibration are stable and within acceptable range. Provide the results of the last 3 tests to demonstrate the stable performance of the pump.

RAI-4:

Item 19 "Full Description of Proposed Alternative," in the request states that the HPCI pump tests will be deferred in the fourth quarter of 2022 and first quarter of 2023. Explain the reference to the 2022 testing because a 10 CFR 50.55a(z) alternative to ASME OM Code test requirements cannot be implemented until authorized by the NRC.

RAI-5:

Item 14 Applicable ASME Code Requirements" includes some strange symbols 'â€¦' in 2 places. Clarify the intention of these symbols.

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