

**Monticello Nuclear Generating Plant, Unit 1 (MNGP)**  
**Subsequent License Renewal Application (SLRA) Safety Review**

**Requests for Confirmation of Information**

**Regulatory Basis:**

Part 54 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," is designed to elicit application information that will enable the U.S. Nuclear Regulatory Commission (NRC) staff to perform an adequate safety review and the Commission to make the necessary findings. Reliability of application information is important and advanced by requirements that license applications be submitted in writing under oath or affirmation and that information provided to the NRC by a license renewal applicant or required to be maintained by NRC regulations be complete and accurate in all material respects. Information that must be submitted in writing under oath or affirmation includes the technical information required under 10 CFR 54.21(a) related to assessment of the aging effects on structures, systems, and components subject to an aging management review. Thus, both the general submission requirements for license renewal applications and the specific technical application information requirements require that submission of information material to NRC's safety findings (see 10 CFR 54.29 standards for issuance of a renewed license) be submitted by an applicant as part of the application.

**Background:**

by letter dated January 9, 2023, (Agencywide Documents Access and Management System [ADAMS] Package Accession No. ML23009A352), and supplemented by letter dated April 3, 2023 (ML23094A136), Northern States Power Company, a Minnesota corporation (NSPM, the applicant), submitted an application for the subsequent license renewal of Renewed Facility Operating License Nos. DPR-22 for the Monticello Nuclear Generating Plant, Unit 1 (MNGP), to the U.S. Nuclear Regulatory Commission (NRC). MNGP submitted the application pursuant to 10 CFR Part 54, "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," for subsequent license renewal.

Between February 27, 2023, and June 2, 2023, the NRC staff conducted audits of MNGP's records to confirm information submitted in the Monticello subsequent license renewal application.

**Request:**

During the audit, the staff reviewed several documents that contain information which will likely be used in conclusions documented in the Safety Evaluation Report (SER). To the best of the staff's knowledge, this information is not on the docket. Any information used to reach a conclusion in the SER must be included on the docket by the applicant. We request that you submit confirmation that the information gathered from the documents and listed below is correct or provide the associated corrected information.

**Requests for Confirmation of Information (RCIs) – SET #1**

<b>RCI No.</b>	<b>Description</b>	<b>MNGP's Response</b>
<p><b>3.5.2-A</b></p>	<p>Subsequent License Renewal Application (SLRA), Table 3.5.2-6, cites Aging Management Review (AMR) item 3.3.1-059 for managing loss of material of steel fire rated doors exposed to indoor uncontrolled air and outdoor air by the Fire Protection Aging Management Program (AMP), which is consistent with Volume 1 of NUREG-2191, (ML17187A031). Doors with intended functions other than a fire barrier intended function (e.g., High Energy Line Break (HELB) barrier, flood barrier) are addressed in the SLRA in the individual structures where they are located and managed by the Structures Monitoring AMP.</p> <p>Revision 63 of Procedure 1216-01, and Revision 47 of Procedure 0275-03, identified functions, in addition to Fire Barrier, for fire rated doors such as HELB barrier and flood barrier.</p> <p>During the audit of the Fire Protection AMP, it was discussed that SLRA Table 3.5.2-6 includes fire barrier commodities and cites only the fire barrier intended function. Other intended functions associated with fire rated doors are addressed in the individual structures where they are located and managed by the Structures Monitoring AMP. Revision 1 of XCELMO00017-REPT-065 includes a reference to Procedure 0275-03, which references Procedure 1216-01. However, Revision 1 of XCELMO00017-REPT-080, does not include a reference to either Procedure 0275-03 or Procedure 1216-01, which address HELB barrier and flood barrier doors in addition to fire rated doors. The applicant stated during the audit that the Fire Protection AMP will manage aging of doors with a fire barrier intended function and the Structures Monitoring AMP will manage aging of doors with other intended functions. The applicant stated that the same procedure and the same inspector will perform the tests and inspections for aging that may impact the door's ability to perform its intended functions.</p> <p>Please confirm that fire rated doors with intended functions other than a fire barrier intended function, will be managed by both the Fire Protection AMP and the Structures Monitoring AMP to ensure all intended functions are maintained during the subsequent period of extended operation (SPEO).</p>	
<p><b>3.5.2-B</b></p>	<p>Revision 1 of FIREPROTECT, states that grout "is considered part of the material constituting the barrier in which it is installed," and is inspected per Procedure 0275-02, as part of the fire barrier. SLRA Table 3.5.2-6 includes commodity types "cementitious fireproofing" and "non-metallic fireproofing." Grout is not explicitly addressed in SLRA Table 3.5.2-6.</p>	

	<p>During the audit of the Fire Protection AMP, the applicant stated that grout is a cementitious fire barrier material and that it is addressed in the SLRA through the cementitious fire barrier commodity types.</p>	
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