



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 20, 2023

LICENSEE: Northern States Power Company
FACILITY: Monticello Nuclear Generating Plant
SUBJECT: SUMMARY OF JULY 14, 2023, PUBLIC MEETING WITH NORTHERN STATES POWER COMPANY REGARDING PROPOSED ALTERNATIVE TO DEFER PERIODIC VERIFICATION TESTING OF REACTOR WATER CLEAN-UP INBOARD ISOLATION VALVE (EPID L-2023-LRM-0045)

On July 14, 2023, a public meeting via webinar was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Northern States Power Company, a Minnesota corporation (NSPM, the licensee), doing business as Xcel Energy. The purpose of the preapplication meeting was to discuss a proposed alternative, under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z)(2), to the American Society of Mechanical Engineers (ASME) 2017 Operations and Maintenance (OM) Code for the periodic verification testing (PVT) of motor-operated valve MO-2397 (reactor water clean-up inboard isolation valve). The meeting notice and agenda, dated May 24, 2023, are available in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML23180A168. A copy of NSPM's presentation is also available in ADAMS at ML23192A755. A list of attendees is enclosed.

During the meeting, NSPM presented information regarding the planned alternative request to perform the PVT of MO-2397 at a frequency of 12 years. The next test would be performed during the 2025 refueling outage. The licensee discussed the following topics as part of its presentation:

- Applicable Inservice Testing Requirements

The licensee stated the following ASME OM Code requirements were applicable to the proposed alternative:

- Mandatory appendix III-3300
- Mandatory appendix III-3310
- Mandatory appendix III-3722

- Proposed Alternative

The licensee discussed the alternative request, which is to defer PVT of MO-2397 to the 2025 refueling outage because the licensee stated performing the test would present a hardship without a compensating increase in quality and safety. Deferring the test would result in a test frequency of 12 years and avoid a forced shutdown. The licensee stated the MO-2397 is in a locked high radiation area, requiring a forced outage to access and significant dose accumulation and increase industrial safety risk.

- Background

The licensee stated the last as-found PVT for MO-2397 was conducted in 2013, and the PVT was required during the 2023 refueling outage to satisfy the 10-year frequency requirement. An error resulted in maintenance performed on the valve without first conducting the as-found PVT. The licensee stated the valve actuator was replaced in 2017 with as-left functional margin greater than 10 percent.

- Schedule

The licensee discussed its planned submittal schedule and requested approval date.

The NRC staff provided feedback on the planned submittal and asked questions throughout the presentation. The NRC staff asked the licensee to discuss the following items in more detail during the meeting:

- Discuss if the submittal will propose alternatives or exemptions to any appendix J requirements.

The licensee stated all appendix J requirements will be met and no alternative or exemption is needed.

- Discuss if the alternative will be a one-time deferment, and if the licensee will return to the 10-year requirement of appendix III following the 2025 refueling outage.

The licensee stated they will return to the 10-year requirement of appendix III following the one-time deferment of the PVT until the 2025 refueling outage.

- Discuss the reason for the missed test. Was it a procedural issue or human performance?

The licensee stated the PVT for MO-2397 was scheduled for the 2023 refueling outage in accordance with appendix III requirements. A human performance error resulted in maintenance being conducted on the valve before the test. The error was entered into the licensee's corrective action program. The error was not a programmatic error.

- Discuss if MO-2397 is torque or limit controlled, and if a more precise measure of margin can be provided.

The licensee stated MO-2397 is torque controlled to open and limit controlled to close. The safety function of the valve is in the closed direction only. The licensee stated they will include information on the valve margin in their submittal.

No regulatory decisions were made during the meeting. Members of the public were in attendance as indicated on the enclosed list of attendees. No comments or questions from the public were received during the meeting. Public Meeting Feedback forms were not received.

Please direct any inquiries regarding this meeting summary to me at 301-415-0680 or Brent.Ballard@nrc.gov.

Sincerely,

/RA/

Brent T. Ballard, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No(s). 50-263

Enclosures:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

JULY 14, 2023, PUBLIC MEETING WITH NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

PROPOSED ALTERNATIVE TO DEFER PERIODIC VERIFICATION TESTING

OF REACTOR WATER CLEAN-UP INBOARD ISOLATION VALVE

Name	Organization
Brent Ballard	U.S. Nuclear Regulatory Commission (NRC)
Brian Lee	NRC
Tom McGowan	NRC
Hironori Peterson	NRC
Thomas Scarbrough	NRC
Jeff Whited	NRC
Katherine Brandtjen	Northern States Power Company (NSPM)
Bobbi Jo Halvorson	NSPM
Gustavo Hernandez	NSPM
Ronald Jacobson	NSPM
Michael Miller	NSPM
Nicholas Oakley	NSPM
Sara Scott	NSPM
伊藤 信哉 / Shinya Ito	Public, Japan Nuclear Regulation Authority (JNRA)
村田 真一 / Shinichi Murata	Public, JNRA

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OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LPL3/LA	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM
NAME	BBallard	SRohrer	JWhited	BBallard
DATE	7/14/2023	7/20/2023	7/20/2023	7/20/2023

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