



2807 West County Road 75
Monticello, MN 55362

July 2, 2026

L-MT-26-013
10 CFR 50.55a(g)(5)(iii)

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

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

10 CFR 50.55a Request RR-004: Inservice Inspection (ISI) Impracticality in Accordance with
10 CFR 50.55a(g)(5)(iii) During the ISI Program 6th Interval

Pursuant to 10 CFR 50.55a(g)(5)(iii), Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), requests relief from certain examination coverage requirements imposed by the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," for the Monticello Nuclear Generating Plant.

This 10 CFR 50.55a request is for nozzle-to-vessel weld examinations performed during the 2025 refueling outage where the required coverage of "essentially 100 percent" could not be obtained when examined to the extent practical. The basis for the 10 CFR 50.55a request is that compliance with the specified requirements is impractical due to plant design.

If there are any questions or if additional information is needed, please contact Ron Jacobson at (612) 330-6542 or ronald.g.jacobson@xcelenergy.com.

Summary of Commitments

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

A handwritten signature in black ink, appearing to read 'Michelle M. Neal'.

Michelle M. Neal
Plant Manager, Monticello Nuclear Generating Plant
Northern States Power Company – Minnesota

Enclosure
cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC

10 CFR 50.55a Request RR-004

Inservice Inspection (ISI) Impracticality in Accordance with 10 CFR 50.55a(g)(5)(iii) during the ISI Program 6th Interval

Pursuant to 10 CFR 50.55a(g)(5)(iii), Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter NSPM), requests relief from certain examination coverage requirements imposed by the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," for the Monticello Nuclear Generating Plant (MNGP).

1.0 ASME CODE COMPONENTS AFFECTED

The components affected are ASME BPV Code, Section XI, Class 1, Reactor Pressure Vessel (RPV), nozzle-to-vessel (NV) shell welds specified below and are discussed further in-detail in Attachment 1. This request is based upon examinations performed during the 2025 MNGP refueling outage, which occurred in the 1st Period of the ISI program 6th Interval.

2025 Limited Exams (1st Period)

Recirculation Suction Nozzle N-1A:	Weld N-1A NV
Recirculation Inlet Nozzle N-2D:	Weld N-2D NV
Feedwater Inlet Nozzle N-4C:	Weld N-4C NV
Core Spray Inlet Nozzle N-5B:	Weld N-5B NV
Jet Pump Instrumentation Nozzle N-8A:	Weld N-8A NV

2.0 APPLICABLE CODE EDITION AND ADDENDA

The applicable ASME Section XI Code for the MNGP ISI program 6th Interval is the 2019 Edition. ASME Section XI, Appendix VIII requirements are implemented as required by 10 CFR 50.55a. Ultrasonic procedures and personnel are qualified to the Performance Demonstration Initiative (PDI). The PDI Program satisfies the requirements of the ASME Section XI 2019 Edition, Appendix VIII, as modified by 10 CFR 50.55a.

3.0 APPLICABLE CODE REQUIREMENT

ASME Class 1 NV shell welds are subject to the examination requirements of Subsection IWB-2500, Table IWB-2500-1 as shown below, and are required to be examined once within the ISI program 6th Interval:

Code Class:	1
References:	IWA-2200(c) IWB-2500, Table IWB-2500-1
Examination Category:	B-D, Full Penetration Welded Nozzles in Vessels
Item Number:	B3.90

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Description:	Nozzle to Vessel (NV) Shell Welds
Component Numbers:	See Section 1.0 above and Attachment 1
System:	Reactor Vessel
Examination Method:	Volumetric – Ultrasonic Testing (UT)
Examination Volume:	Figure IWB-2500-7(b)

At the start of the MNGP ISI program 6th Interval, ASME Code Case N-613-2 (Reference 1) was applied in the ISI Plan per issued Regulatory Guide (RG) 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 20 (Reference 2). Table 1 of RG 1.147 lists ASME Code Case N-613-2 as acceptable to the NRC for use by a licensee with no identified limitations or modifications.

As an acceptable alternative to ASME Section XI Figure IWB-2500-7(b) for RPV nozzle-to-vessel welds, ASME Code Case N-613-2 permits an examination volume that includes the width of the reactor-nozzle-to-shell weld plus one-half inch of adjacent base metal on each side of the widest part of the weld. In comparison, the examination volume required by the Figure IWB 2500-7(b) includes the width of the weld plus the adjacent base metal on each side of the widest part of the weld equal to one-half of the vessel shell wall thickness.

ASME Section XI IWA-2200(c) states in part:

When performing VT-1, surface, radiographic, or ultrasonic examination on a component with defined surface or volume, essentially 100% of the required surface or volume shall be examined. Essentially 100% coverage is achieved when the applicable examination coverage is greater than 90%...

Per IWA-2200(c), Nonmandatory Appendix S [Evaluating Coverage for Section XI Nondestructive Examination] may be used as a guideline to determine examination coverage, i.e., when the defined volume cannot be obtained due to a volumetric limitation.

Nonmandatory Appendix S, Article S-3000, specifically Sub-Article S-3500, provides examination coverage evaluation guidelines for ultrasonic examination of welds. Nonmandatory Appendix S defines a volumetric limitation as:

Inability to examine the required volume because of interference, obstruction, geometrical configuration, or metallurgical condition of material being examined.

4.0 IMPRACTICALITY OF COMPLIANCE

Construction Permit (CP) CPPR-31 was obtained for the MNGP on June 19, 1967. The MNGP systems and components were designed for construction before the examination requirements of ASME Section XI were formalized and published. Therefore, because MNGP was not specifically designed to meet the requirements of ASME Section XI, full compliance is not feasible or practical within the limits of the current plant design.

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10 CFR 50.55a recognizes the limitations to inservice inspection of components in accordance with Section XI of the ASME Code, which are imposed due to early plants' design and construction, as follows:

10 CFR 50.55a(g)(1): Inservice inspection requirements for older plants (pre 1971 CPs). For a boiling or pressurized water-cooled nuclear power facility whose construction permit was issued before January 1, 1971, components (including supports) must meet the requirements of paragraphs (g)(4) and (g)(5) of this section to the extent practical.

10 CFR 50.55a(g)(4): Inservice inspection standards requirement for operating plants. Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) that are classified as ASME Code Class 1, Class 2, and Class 3 must meet the requirements, except design and access provisions and preservice examination requirements, set forth in Section XI of editions and addenda of the ASME BPV Code...to the extent practical within the limitations of design, geometry, and materials of construction of the components.

10 CFR 50.55a(g)(5)(iii): ISI program update: Notification of impractical ISI Code requirements. If the licensee has determined that conformance with a Code requirement is impractical for its facility the licensee must notify the NRC and submit, as specified in § 50.4, information to support the determinations.

The examination limitations on the subject components are due to inherent nozzle design geometric contours (see Attachments 1 and 2).

A description of the examination methodology used to provide the maximum obtainable coverage is provided in Section 6 of this request. This methodology is based on ASME Section XI, Appendix VIII qualification and was applied to the extent practical within the design constraints of the components. Attachment 2 provides cross-sectional diagrams of the subject welds showing the geometric contour of the component design in relation to the welds and the coverage obtained within the examination volume requirements of ASME Code Case N-613-2, Figure 2.

5.0 BURDEN CAUSED BY COMPLIANCE

Compliance with the examination coverage requirements of ASME Section XI would require modification, redesign, or replacement of components where geometric contour and physical obstruction is inherent to the component design and installation.

6.0 PROPOSED ALTERNATIVE AND BASIS FOR USE

6.1 Proposed Alternative

NSPM requests relief for the components listed in Attachment 1 on the basis that the required examination coverage of "essentially 100 percent" is impractical due to physical obstructions and the limitations imposed by design, geometry and materials of construction.

NSPM has performed qualified examinations that achieved the maximum, practical amount of coverage obtainable within the limitations imposed by the design of the components with no detectable indications.

Therefore, pursuant to 10 CFR 50.55a(g)(5)(iii), NSPM requests authorization of an alternative to the requirements of ASME Section XI Table IWB-2500-1, Category B-D, Item B3.90 and associated ASME Code Case N-613-2 and proposes to use these completed exams as an acceptable alternative that provides reasonable assurance of continued structural integrity.

6.2 Basis for Use

6.2.1 *Nozzle-to-Vessel Shell Welds*

2025
N-1A NV
N-2D NV
N-4C NV
N-5B NV
N-8A NV

The NSPM Nondestructive Examination (NDE) UT procedures incorporate inspection techniques qualified under Appendix VIII of the ASME Section XI Code by the PDI.

Examinations of the RPV nozzle-to-shell welds were performed from the RPV exterior surface using a manual contact method from the nozzle blend radius, the NV shell weld, and vessel shell surface. Coverage using the alternative examination volume permitted by Code Case N-613-2 was obtained by following the scan parameters designated within NSPM NDE procedures for each nozzle configuration and angle, including those parameters defined by an MNGP-specific Electric Power Research Institute (EPRI) computer modeling report (Reference 3). Note that the scans defined by the EPRI reports are applicable only to the inner 15 percent of the weld volume and only when scanning in a circumferential direction, parallel to the weld.

The refracted longitudinal wave mode of propagation was applied for all scans of the exam volume in the radial direction, perpendicular to the weld. The refracted longitudinal wave mode of propagation was also applied to the outer 85 percent of the exam volume for parallel scans. As required by the NSPM NDE procedures and the EPRI computer modeling reports, the

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shear wave mode of propagation was applied for each of the transducer and wedge combinations required for the remaining inner 15 percent of the parallel scan exam volume.

The subject nozzle-to-vessel welds received the required examination(s) to the extent practical within the limited access of the component design. One hundred percent coverage was obtained for the inner 15 percent of the examination volume for the radial and parallel scans. The examination limitations for the subject components were encountered within the outer 85 percent of the examination volume for the parallel and radial scans. For the examinations conducted, satisfactory results were achieved, and no flaw indications were detected.

Due to the design of these nozzle-to-shell welds, it was not feasible to effectively perform a volumetric examination of "essentially 100 percent" of the required volume. The NV welds are accessible from the vessel plate side of the weld and are examined to the extent practical with qualified techniques; however, the curvature of the nozzle forging and proximity to the weld preclude obtaining further coverage of the excluded areas within the outer 85 percent of the examination volume.

6.2.2 Exam Coverage Determination

As required by procedure, when limitations to ISI examinations are encountered that prevent obtaining full coverage of a required volume, the limitations are required to be quantified and recorded.

The method used to determine coverage is based on field measurements applied to a two-dimensional plot. This allows an informed approximation to be made of the coverage achieved. The methodology is appropriate to the application in that the limitations are physical and the methods applied to the examination are established by qualified techniques.

The coverage drawings in Attachment 2 give a representation of the examination volume and the weld interface line shown in Figure 2 of Code Case N-613-2 for the NV welds. The areas of examination volume coverage and areas of no examination volume coverage are identified on the respective drawing for each nozzle. The contour on the exterior surface of the nozzles causes transducer liftoff and inhibits the ability to maintain adequate coupling necessary to transmit and receive the ultrasonic sound energy.

Additional coverage with meaningful results was not achievable or practical for the limited areas with implementation of performance-based examination methods without redesigning and modifying the components to allow additional scanning surfaces. NSPM has concluded that if significant service-induced degradation existed in the subject welds, it would have been identified by the examinations performed. Therefore, in accordance with 10 CFR 50.55a(g)(1) and (4), each of the subject welds were examined to the extent practical.

For comparison with current results, Attachment 3 to this Enclosure provides historical examination results from the ISI 5th Interval for the subject welds, including percent coverage and their corresponding, granted 10 CFR 50.55a request (Reference 4). The coverage

obtained for the 5th Interval exams was the same as obtained for the current exams listed in Attachment 1.

6.2.3 Materials, Aging Management, Similar Components

The materials for the subject components are A508 Class 2 nozzle forgings welded to A533 Grade B, Class 1 vessel shell plate. The weld filler material for the subject joints was E8018NM. Internal surface cladding materials are E309 15 for the base layer and ER308L or E308L 15 for subsequent layers.

The MNGP reactor vessel water chemistry is controlled in accordance with Revision 1 of the BWR Water Chemistry Guidelines (Reference 5). Hydrogen water chemistry system is used to reduce the oxidizing environment in the reactor coolant. Beginning in 2013, NSPM has also implemented Online Noble-Metal Chemistry at MNGP. These additional measures provide added assurance against the initiation of cracking or corrosion from the inside surface of the reactor vessel. An inerted primary containment environment during operation provides assurance of corrosion protection on the outside surface of the reactor vessel.

Additionally, as Class 1 Examination Category B-P components, system pressure testing with VT-2 visual examinations are required every outage prior to startup. The VT-2 examinations were performed on the subject components in association with the Reactor Coolant Pressure Boundary system pressure test performed during the 2025 refueling outage. No evidence of pressure boundary leakage was identified during this system test.

These are the first NV welds with limitations to coverage examined during the current interval.

6.2.4 Summary

The provisions described above, as an alternative to the Code requirement for examination coverage, will continue to provide reasonable assurance of the structural integrity of the subject welds. The volumetric examinations were completed to the extent practical, and no unacceptable flaws were identified. VT-2 examinations performed on the subject components during system pressure testing each refueling outage in accordance with examination Category B-P provide continued assurance that the structural integrity of the subject components is maintained. Additionally, the MNGP Water Chemistry Program and inerted primary containment environment provide added measures of protection for the component materials.

Five NV weld examinations were previously performed during the ISI Program 5th Interval having limitations with respect to coverage, and relief was granted by the NRC pursuant to 10 CFR 50.55a(g)(6)(i), as shown in Attachment 3, for the components included in this request.

Therefore, pursuant to 10 CFR 50.55a(g)(5)(iii), NSPM requests that the NRC grant relief from the ASME Section XI examination requirements for the subject NV welds.

7.0 DURATION OF PROPOSED ALTERNATIVE

NSPM requests the granting of this relief for the MNGP ISI program 6th Interval that began on June 1, 2023 and is scheduled to end on May 31, 2035.

8.0 PRECEDENTS

The NRC has previously granted relief for these components during the 5th Ten-Year Inservice Inspection Interval (Reference 4).

9.0 REFERENCES

1. ASME Section XI Code Case N-613-2, "Ultrasonic Examination of Full Penetration Nozzles in Vessels, Examination Category B-D, Item No's. B3.10 and B3.90, Reactor Nozzle-To-Vessel Welds, Figs. IWB-2500-7(a), (b), and (c), Section XI, Division 1," dated December 20, 2010.
2. NRC Regulatory Guide 1.147, Revision 20, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," dated December 2021 (ADAMS Accession No. ML16321A336)
3. EPRI Internal Report IR-2004-63, "Monticello Nozzle Inner Radius and Nozzle-to-Shell Weld Examinations," dated December 2004.
4. NRC letter to NSPM, "Monticello Nuclear Generating Plant (MNGP) – Relief Request RR-009 Regarding Relief from Examination Coverage Requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for the Fifth 10-Year Inservice Inspection Program Interval (TAC No. MF4258)," dated February 19, 2015 (ADAMS Accession No. ML1502A152).
5. EPRI Report 3002002623, "BWRVIP-190 Revision 1: BWR Vessel and Internals Project, Volume 1: BWR Water Chemistry Guidelines – Mandatory, Needed, and Good Practice Guidance," dated April 2014.

ENCLOSURE, ATTACHMENT 1

MONTICELLO NUCLEAR GENERATING PLANT

10 CFR 50.55a Request RR-004

Inservice Inspection Impracticality in Accordance
with 10 CFR 50.55a(g)(5)(iii) during the ISI Program 6th Interval

**SUMMARY OF 2025 REFUELING OUTAGE EXAMS FOR WHICH
ESSENTIALLY 100 PERCENT COVERAGE WAS NOT OBTAINED
ON CATEGORY B-D NOZZLE-TO-VESSEL WELDS**

(1 Page Follows)

**2025 Refueling Outage, Summary of Exams, Essentially 100 Percent Coverage
Not Obtained, Category B-D, "Full Penetration Welds of Nozzles in Vessels," Item No. B3.90**

Code Category and Item No.	System and Component Description	Component ID	Code Component and Examination Volume Required	Percent Coverage Obtained	Limitations	Indications Reported	Exam Report Numbers
B-D B3.90	Reactor Vessel Recirculation Suction Nozzle N-1A	N-1A NV	Nozzle-to-Vessel Weld, Code Case N-613-2 Figure 2	83%	Limited due to nozzle configuration	None	25-UT-051 25-UT-052
B-D B3.90	Reactor Vessel Recirculation Inlet Nozzle N-2D	N-2D NV	Nozzle-to-Vessel Weld, Code Case N-613-2 Figure 2	82%	Limited due to nozzle configuration	None	25-UT-044 25-UT-045
B-D B3.90	Reactor Vessel Feedwater Inlet Nozzle N-4C	N-4C NV	Nozzle-to-Vessel Weld, Code Case N-613-2 Figure 2	79%	Limited due to nozzle configuration	None	25-UT-038 25-UT-039 25-UT-040
B-D B3.90	Reactor Vessel Core Spray Inlet Nozzle N-5B	N-5B NV	Nozzle-to-Vessel Weld, Code Case N-613-2 Figure 2	81%	Limited due to nozzle configuration	None	25-UT-034 25-UT-041
B-D B3.90	Reactor Vessel Jet Pump Instrumentation Nozzle N-8A	N-8A NV	Nozzle-to-Vessel Weld, Code Case N-613-2 Figure 2	83%	Limited due to nozzle configuration	None	25-UT-042 25-UT-043

ENCLOSURE, ATTACHMENT 2

MONTICELLO NUCLEAR GENERATING PLANT

10 CFR 50.55a Request RR-004

Inservice Inspection Impracticality in Accordance
with 10 CFR 50.55a(g)(5)(iii) during the ISI Program 6th Interval

**EXAM LIMITATIONS IMPOSED BY COMPONENT
DESIGN AND CONSTRUCTION**

(15 Pages Follow)

Exam Limitations Imposed by Component Design and Construction

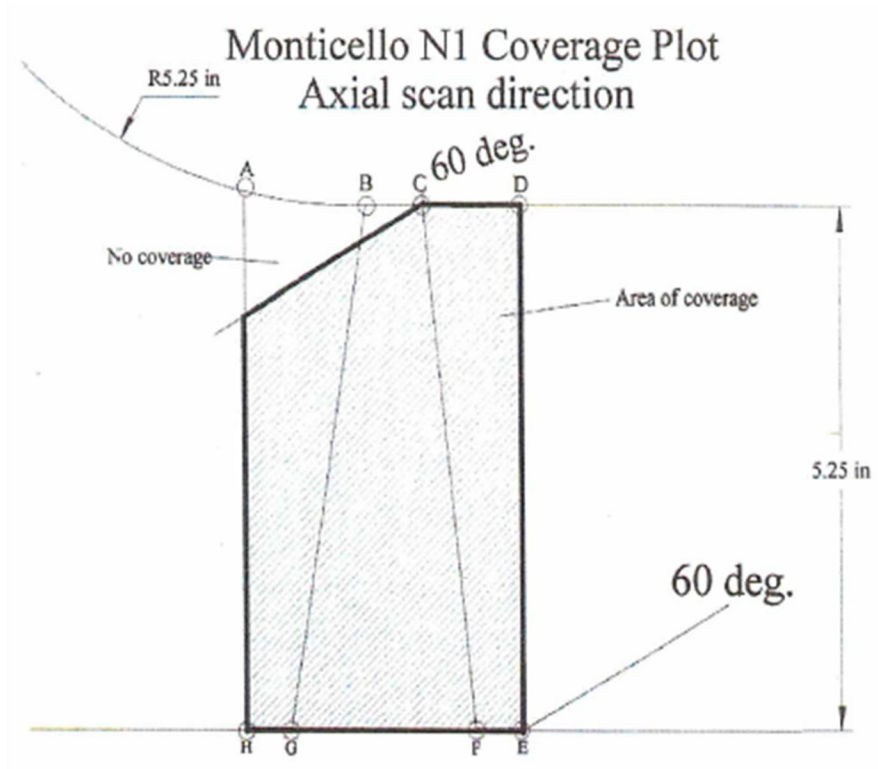
This attachment contains a series of excerpts from the Inservice Inspection (ISI) Ultrasonic Testing (UT) reports applicable to the subject components.

These excerpts contain sketches depicting the component configuration with physical limitations imposed by the design, e.g., geometrical contour and weld position. The sketches provide a cross-sectional view depicting the UT coverage and the coverage limitations in relation to the required examination volume.

Descriptive details are also included with the sketches to provide reference to the configuration, e.g., interior/exterior surface, shell side / nozzle side of weld, weld area, required exam volume, area of coverage, etc.

Component	Report No.	Page(s)
N-1A NV	2025UT052	Pages 2-5
N-2D NV	2025UT045	Pages 6-8
N-4C NV	2025UT040	Pages 9-10
N-5B NV	2025UT041	Pages 11-13
N-8A NV	2025UT043	Pages 14-15

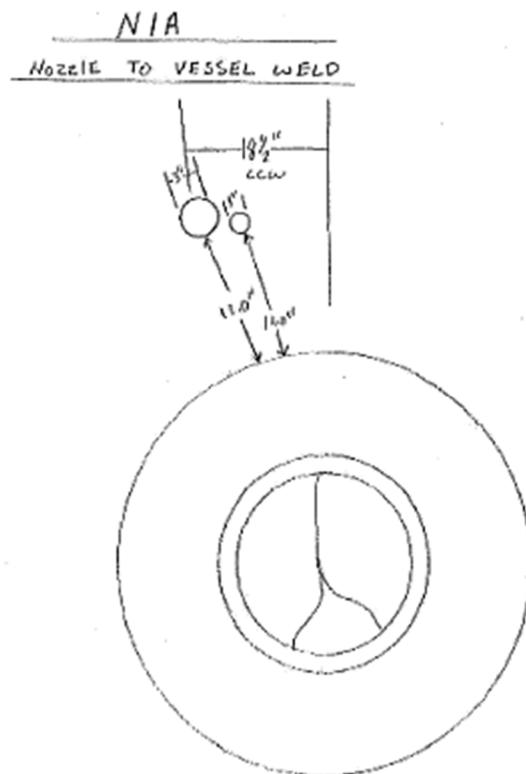
Component N-1A NV
Report No. 2025UT052
Axial (Radial) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Shaded area indicates exam coverage obtained. See following 2 pages with exception for thermocouple interference.

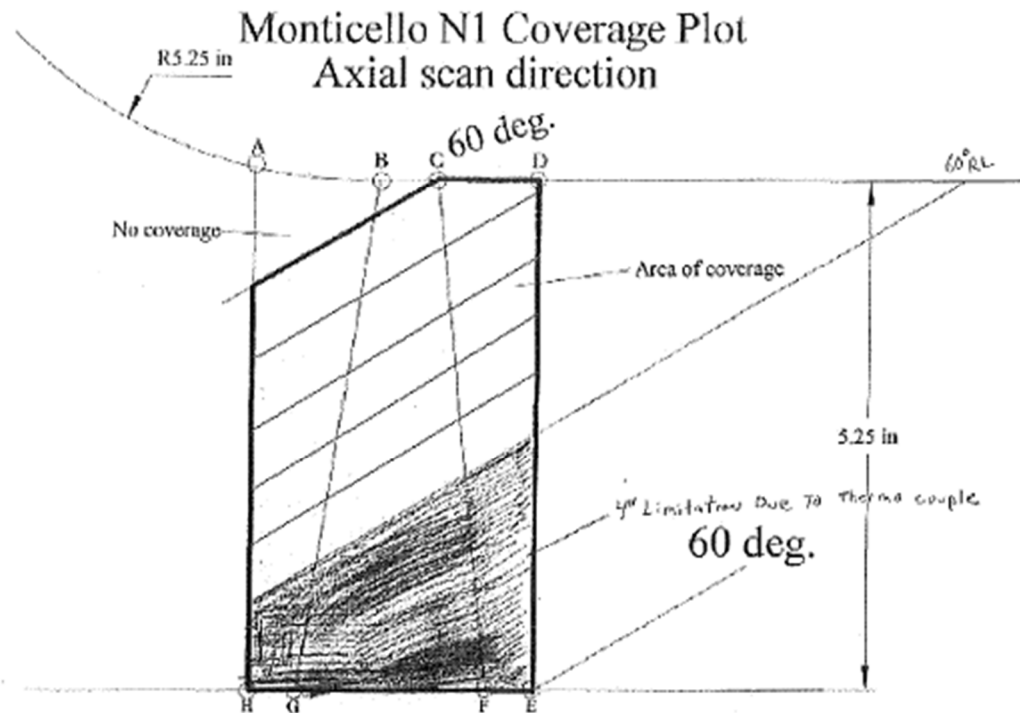
Component N-1A NV
Report No. 2025UT052
Axial (Radial) Scan Plot



NOTES:

- View looking at nozzle.
- 4" limitation at back of scan due to thermocouples. See next page for cross-sectional view.

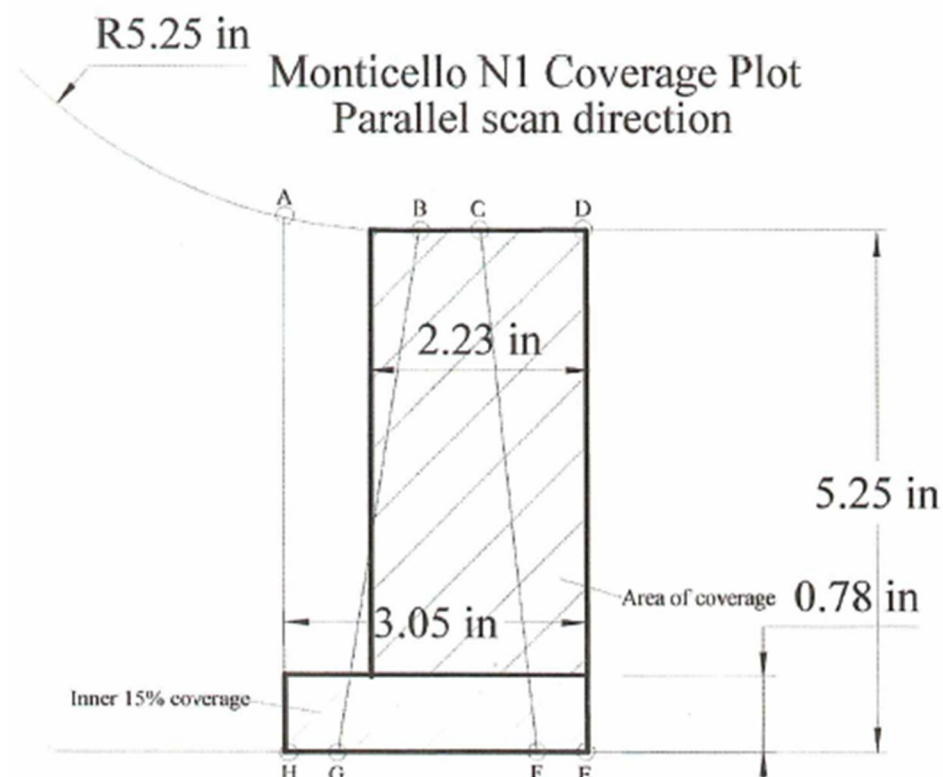
Component N-1A NV
Report No. 2025UT052
Axial (Radial) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Area of coverage, noted in slash patterned area at the top.
- 4" wide area of no coverage at back of scan due to thermocouples is noted in the shaded area at the bottom.

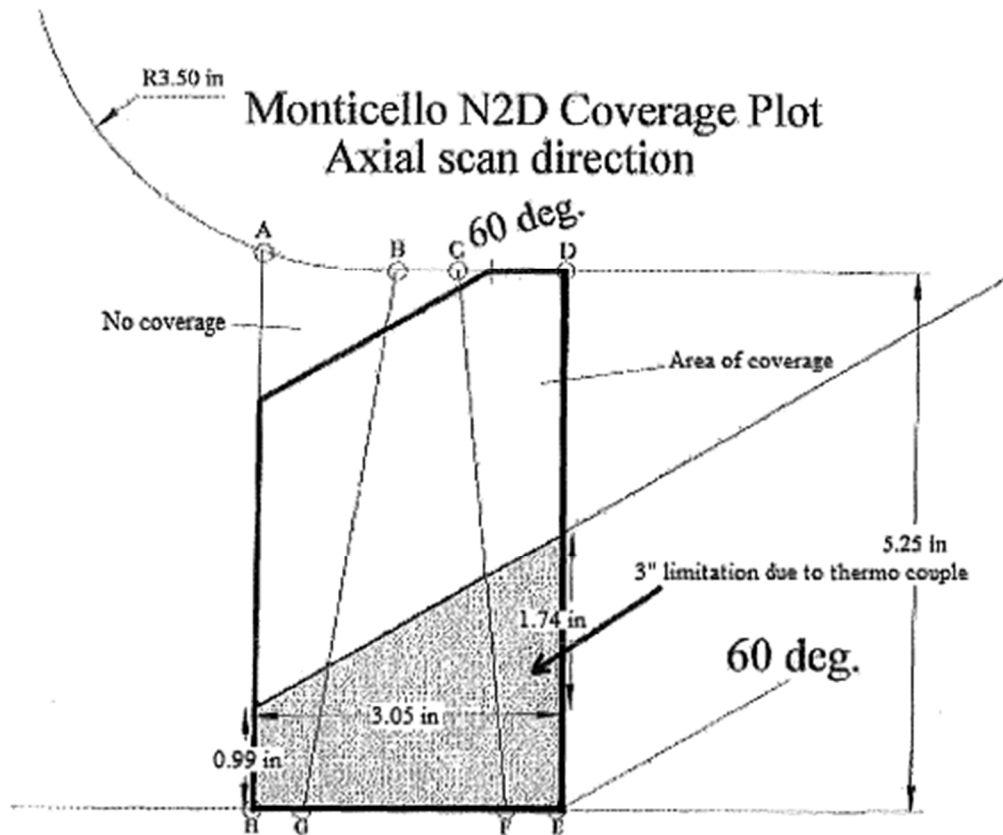
Component N-1A NV
Report No. 2025UT052
Parallel (Circular) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Slashed pattern area indicates exam coverage obtained.

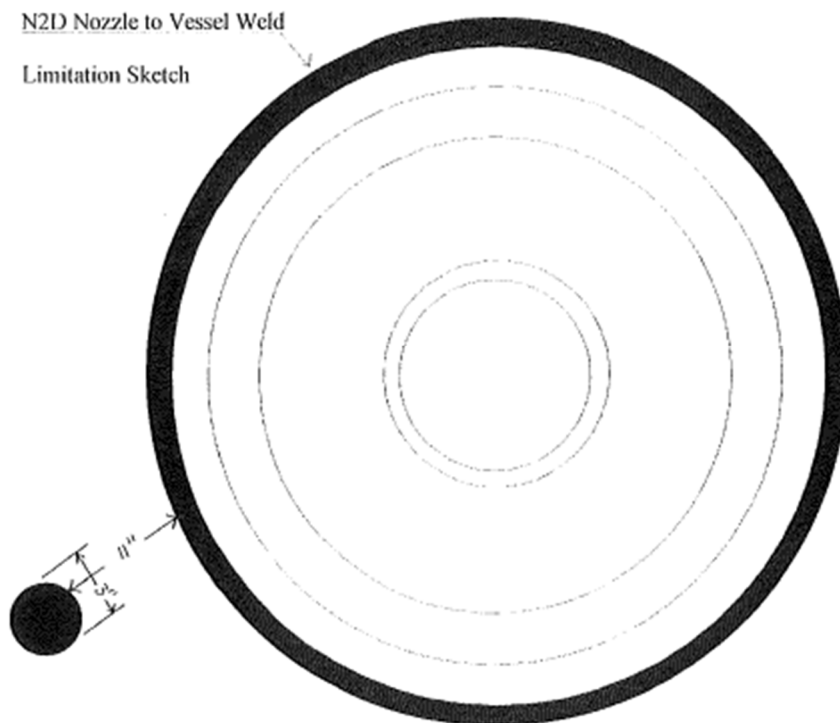
Component N-2D NV
Report No. 2025UT045
Axial (Radial) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Area of coverage, outlined with bold lines with exception of a
- 3" wide area of no coverage at the back of the scan due to a thermocouple, is indicated by the shaded area.

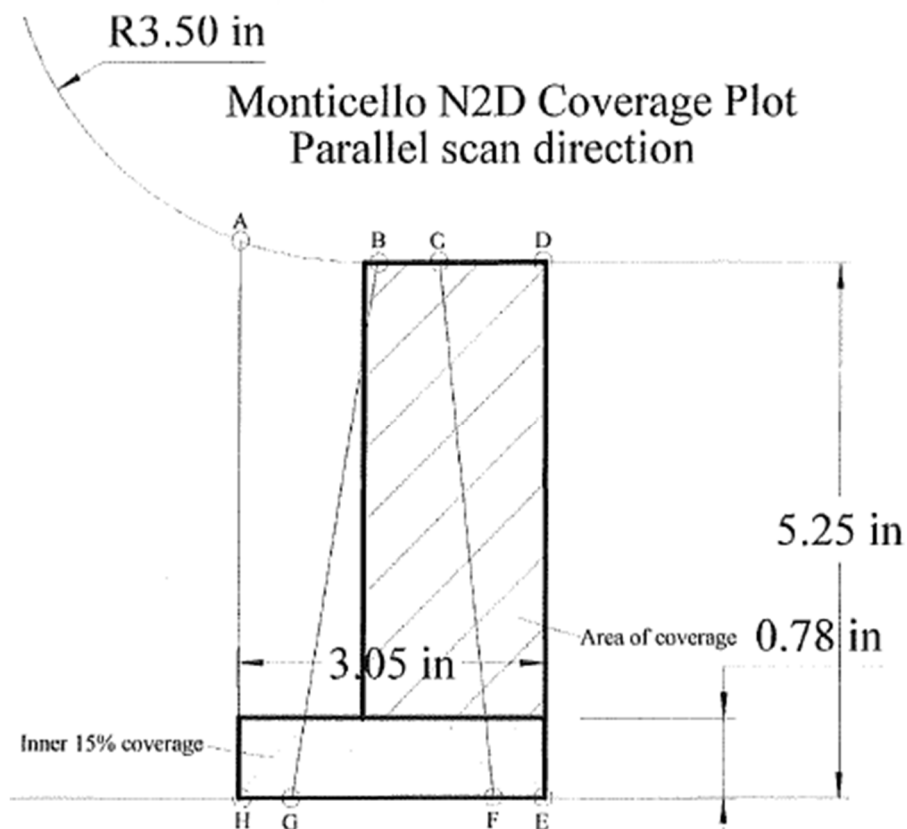
Component N-2D NV
Report No. 2025UT045
Axial (Radial) Scan Plot



NOTES:

- View looking at nozzle.
- 3" limitation at back of scan due to thermocouple. See previous page for cross-sectional view.

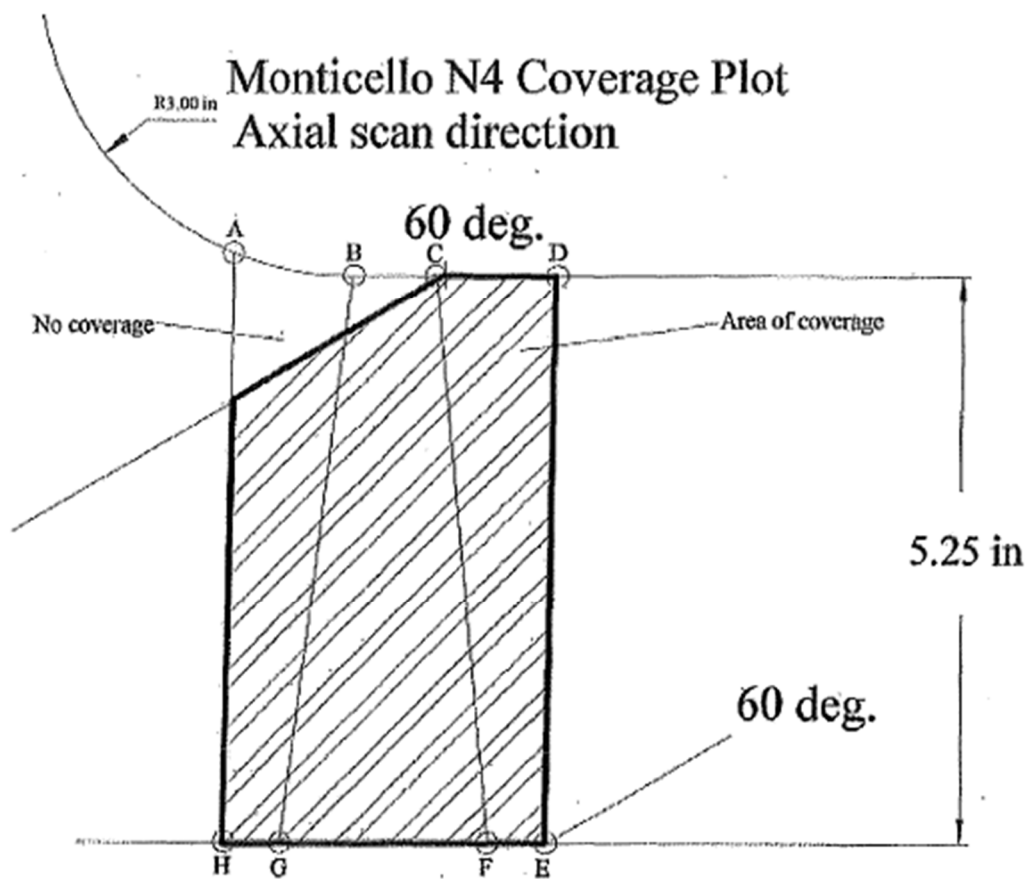
Component N-2D NV
Report No. 2025UT045
Parallel (Circular) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Slashed pattern area indicates exam coverage obtained.

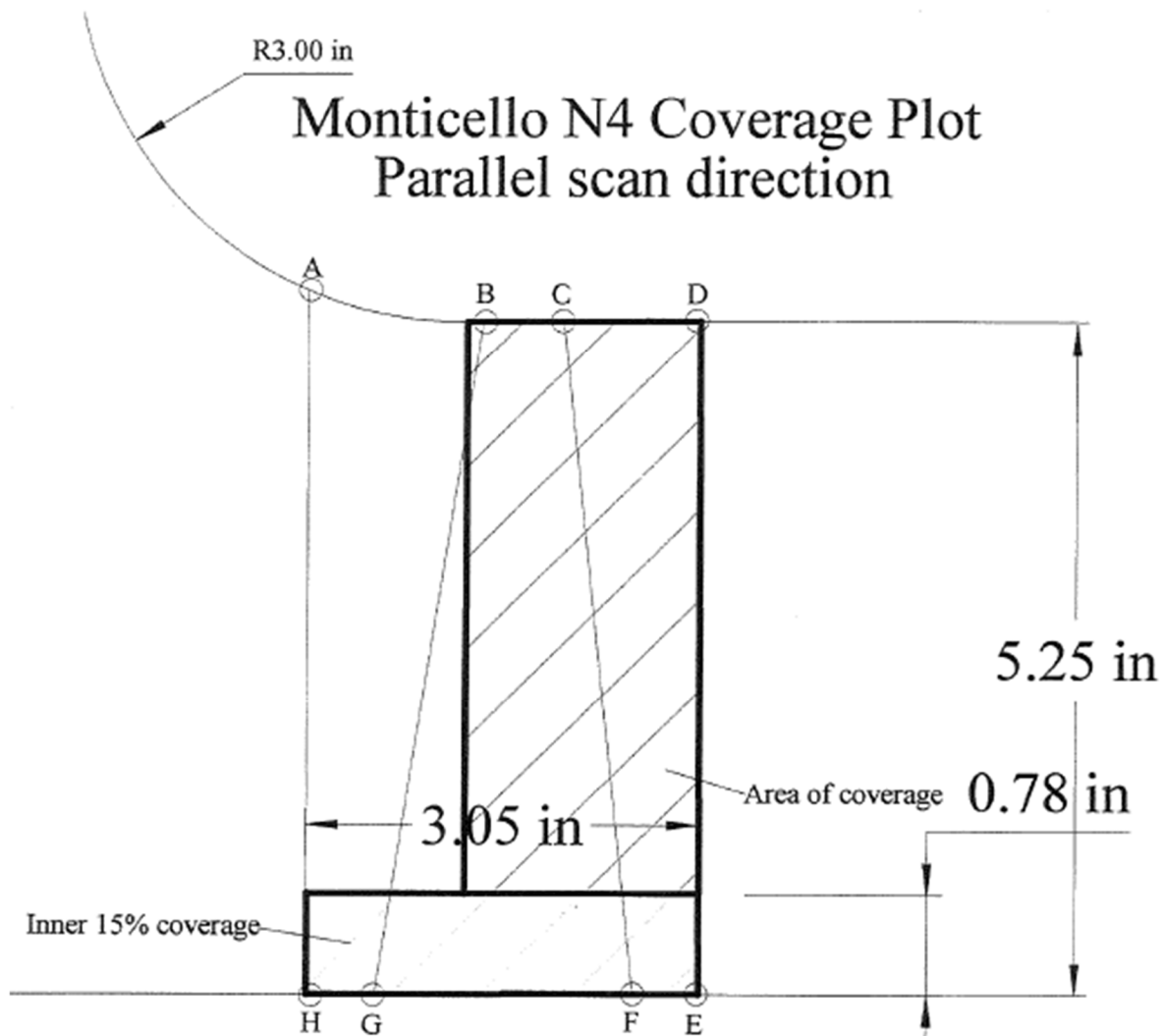
Component N-4C NV
Report No. 2025UT040
Axial (Radial) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Slashed pattern area indicates exam coverage obtained.

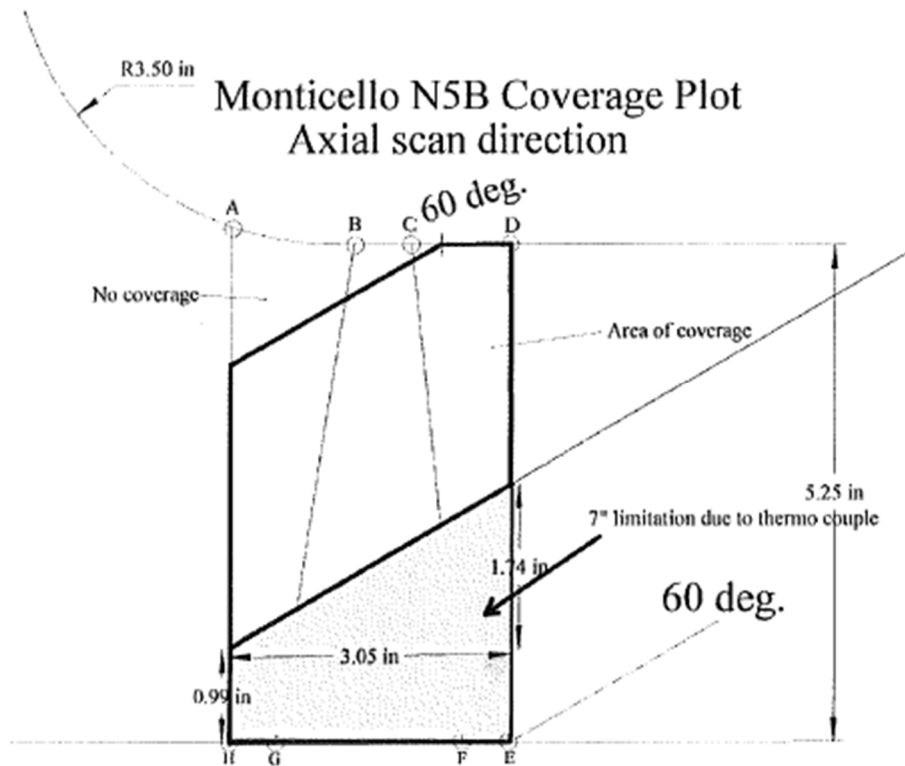
Component N-N4C NV
Report No. 2025UT040
Parallel (Circular) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Slashed pattern area indicates exam coverage obtained.

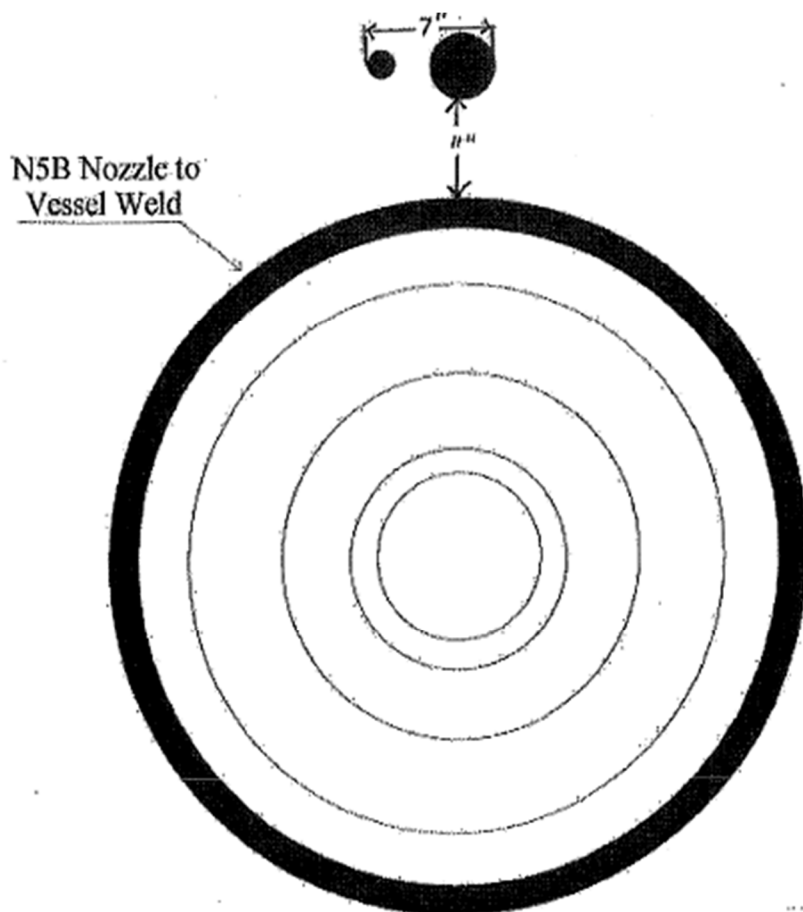
Component N-5B NV
Report No. 2025UT041
Axial (Radial) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Area of coverage, outlined with bold lines with exception of a
- 7" wide area of no coverage at the back of the scan due to a thermocouple, is indicated by the shaded area.

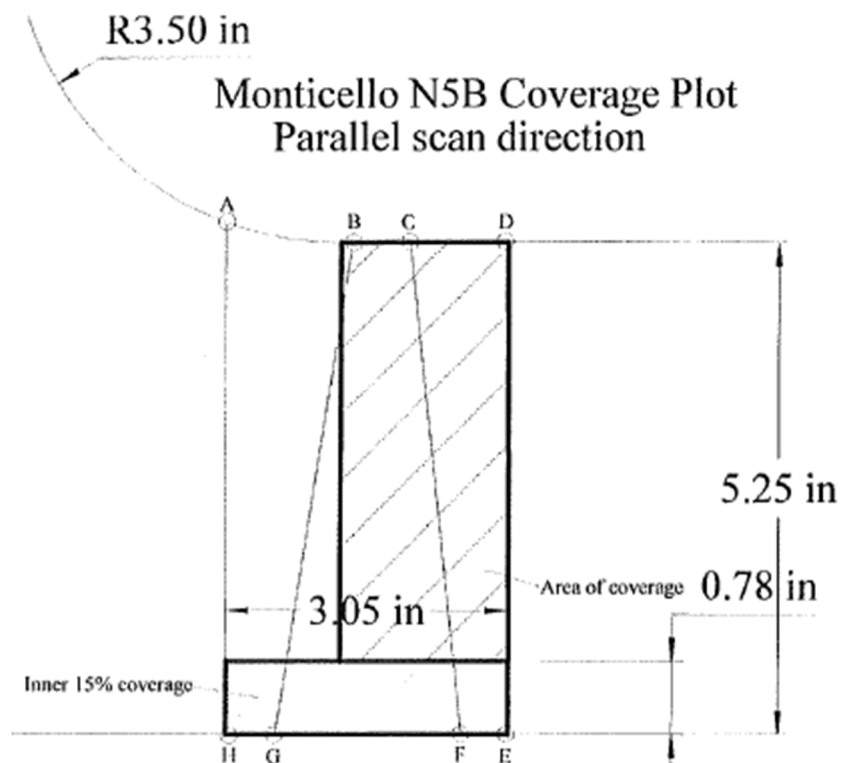
Component N-5B NV
Report No. 2025UT041
Axial (Radial) Scan Plot



NOTES:

- View looking at nozzle.
- 7" limitation at back of scan due to thermocouple. See previous page for cross-sectional view.

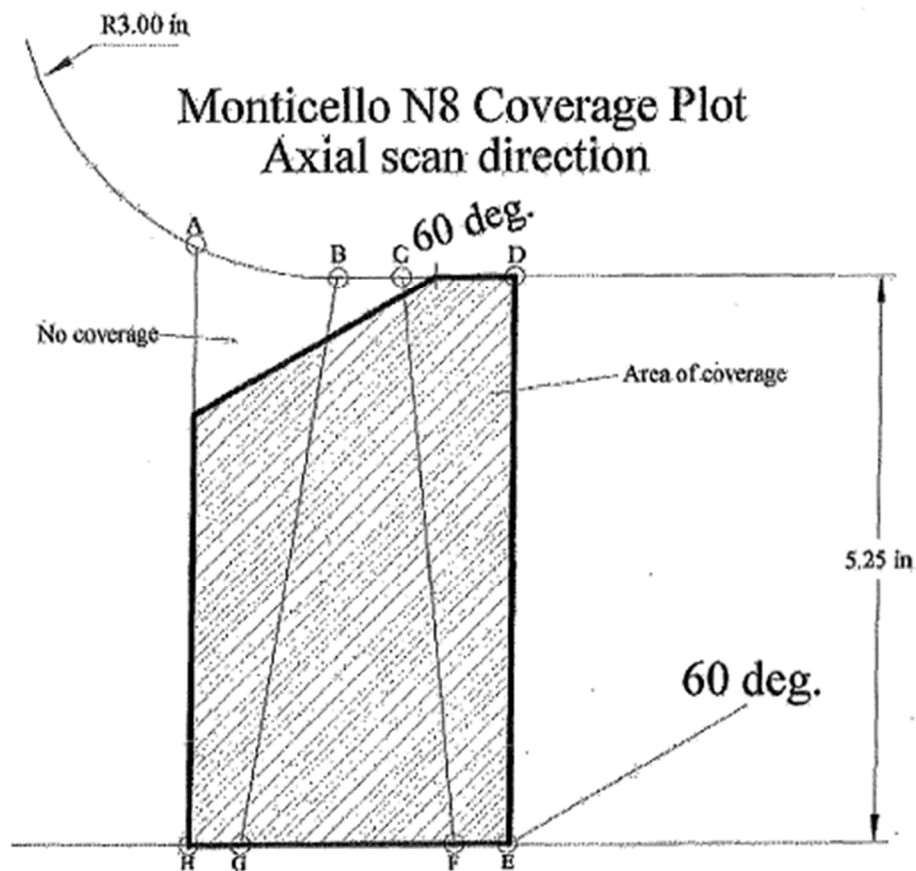
Component N-5B NV
Report No. 2025UT041
Parallel (Circular) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Slashed pattern area indicates exam coverage obtained.

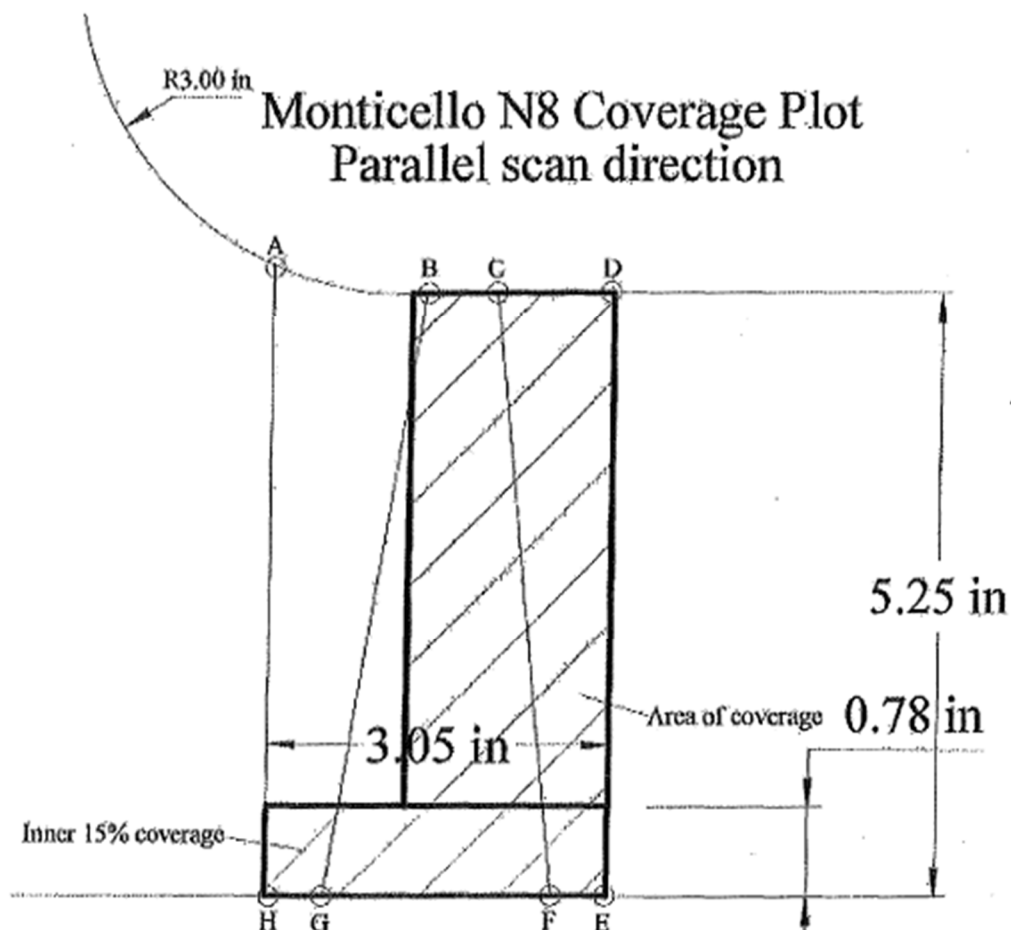
Component N-8A NV
Report No. 2025UT043
Axial Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Slashed pattern area indicates exam coverage obtained.

Component N-8A NV
Report No. 2025UT043
Parallel (Circular) Scan Plot



NOTES:

- Nozzle on left side of weld; RPV shell on right side of weld.
- Exterior of vessel at the top; Interior of vessel at the bottom.
- Slashed pattern area indicates exam coverage obtained.

ENCLOSURE, ATTACHMENT 3

MONTICELLO NUCLEAR GENERATING PLANT

10 CFR 50.55a Request RR-004

Inservice Inspection Impracticality in Accordance
with 10 CFR 50.55a(g)(5)(iii) during the ISI Program 5th Interval

**SUMMARY OF PAST 5th INTERVAL EXAMINATION RESULTS
FOR WHICH THE NRC GRANTED RELIEF DUE TO EXAM LIMITATIONS**

(3 Pages Follow)

**Summary of 5th Interval Examination Results
for which the NRC Granted Relief Due to Exam Limitations**

Table 1. Prior (5th) Interval Limited Examinations of the Same Welds of this Request

Weld	Exam Year	Exam Coverage	5th Interval Exam Results	5th Interval 10 CFR 50.55a Request	5th Interval NRC Approval Date
N-1A	2013	83%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-2D	2013	82%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-4C	2013	79%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-5B	2013	81%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-8A	2013	83%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)

Table 2. Complete List of 5th Interval Limited Examinations.

Weld	Exam Year	Exam Coverage	5th Interval Exam Results	5th Interval 10 CFR 50.55a Request	5th Interval NRC Approval Date
N-1A	2013	83%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-2D	2013	82%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-4C	2013	79%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-5B	2013	81%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-8A	2013	83%	No flaw indications	RR-009 (Reference 1)	Feb. 19, 2015 (Reference 2)
N-2E NV	2017	83%	No flaw indications	RR-012 (Reference 3)	June 12, 2019 (Reference 4)
N-4A NV	2017	83%	No flaw indications	RR-012 (Reference 3)	June 12, 2019 (Reference 4)
N-9 NV	2017	85%	No flaw indications	RR-012 (Reference 3)	June 12, 2019 (Reference 4)
N-3C NV	2019	83%	One indication ¹	RR-017 (Reference 5)	Nov. 21, 2024 (Reference 6)
N-4B NV	2019	83%	No flaw indications	RR-017 (Reference 5)	Nov. 21, 2024 (Reference 6)
N-10 NV	2019	85%	No flaw indications	RR-017 (Reference 5)	Nov. 21, 2024 (Reference 6)
N-2G NV	2021	78%	No flaw indications	RR-017 (Reference 5)	Nov. 21, 2024 (Reference 6)
N-6A NV	2021	86%	No flaw indications	RR-017 (Reference 5)	Nov. 21, 2024 (Reference 6)
N-7 NV	2021	87%	No flaw indications	RR-017 (Reference 5)	Nov. 21, 2024 (Reference 6)
N-4D NV	2023	83%	No flaw indications	RR-017 (Reference 5)	Nov. 21, 2024 (Reference 6)

¹ Previously recorded sub-surface indication was re-confirmed and re-evaluated as acceptable per Code paragraph IWB-3512-1. No observed change since previous reported exam in 2009.

REFERENCES FOR ENCLOSURE, ATTACHMENT 3

1. NSPM letter to NRC, "10 CFR 50.55a Request No. 009: Relief from Impractical Examination Coverage Requirements Pursuant to 10 CFR 50.55a(g)(5)(iii) for the Fifth Ten-Year Inservice Inspection Interval," dated June 6, 2014 (ADAMS Accession No. ML14157A205).
2. NRC letter to NSPM, "Monticello Nuclear Generating Plant - Relief Request RR-009 Regarding Relief from Examination Coverage Requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code for the Fifth 10-Year Inservice Inspection Program Interval (TAC No. MF4258)," dated February 19, 2015 (ADAMS Accession No. ML15028A152).
3. NSPM letter to NRC, "10 CFR 50.55a Request RR-012: Inservice Inspection Impracticality in Accordance with 10 CFR 50.55a(g)(5)(iii) during the Fifth Ten-Year Interval," dated May 11, 2018 (ADAMS Accession No. ML18131A179).
4. NRC letter to NSPM, "Monticello Nuclear Generating Plant - Request for Relief for Coverage of Nozzle-To-Vessel Weld Examinations (EPID L-2018-LLR-0072)," dated June 12, 2019 (ADAMS Accession No. ML19148A694).
5. NSPM letter to NRC, "10 CFR 50.55a Request RR-017: Inservice Inspection Impracticality in Accordance with 10 CFR 50.55a(g)(5)(iii) during the Fifth Ten-Year Interval," dated January 30, 2024 (ADAMS Accession No. ML24033A295).
6. NRC letter to NSPM, "Monticello Nuclear Generating Plant, Unit No. 1 – Relief Request RR017, Inservice Inspection (ISI) Impracticality During the Fifth 10-Year Interval (EPID L-2024-LLR-0014)," dated November 21, 2024 (ADAMS Accession No. ML24323A214).