

December 21, 2001

Mr. Jeffrey S. Forbes
Site Vice President
Monticello Nuclear Generating Plant
Nuclear Management Company, LLC
2807 West County Road 75
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO LICENSE AMENDMENT REQUEST
(TAC NO. MB2246)

Dear Mr. Forbes:

By application dated June 18, 2001, Nuclear Management Company, LLC, requested a license amendment to change the Technical Specifications (TSs) to (1) revise the reference point for reactor vessel level instrumentation specifications to use instrument "zero" instead of "top of active fuel" (TAF); (2) simplify the safety limits and limiting safety system settings to eliminate specifications that are unnecessary, outdated, or redundant to other TSs; (3) change the reactor coolant system pressure safety limit from 1335 psig to 1332 psig to correct a minor calculation error; and (4) make corresponding TS Bases changes. Based on the staff's review of your application, we request that you provide additional information as discussed in the enclosure to this letter.

The enclosed request was discussed with Mr. D. Neve of your staff on December 20, 2001. A mutually agreeable target date of January 30, 2002, for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-2296 at the earliest opportunity.

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-263

Enclosure: Request for Additional Information

cc w/encl: See next page

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DATE	12/20/01	12/20/01	12/21/01

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Monticello Nuclear Generating Plant

cc:

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REQUEST FOR ADDITIONAL INFORMATION

RELATED TO LICENSE AMENDMENT REQUEST DATED JUNE 18, 2001

NUCLEAR MANAGEMENT COMPANY, LLC

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

1. Exhibit A, Section II.1, "Reactor Vessel Level Instrumentation Reference Point" discusses removing the upper limit specification on reactor vessel level.

Please provide your safety basis for requesting this change to the TS. This section also states the removal makes the specification consistent with NUREG-1433, Standard Technical Specifications (STS), and that the instrument calibration will conform to standard setpoint methodology. Please support or clarify these statements in your analysis and discuss how the STS and the setpoint methodologies, if they were evaluated for application to Monticello, are related to the proposed change.

2. Exhibit A, Section II.2, "Simplify the Safety Limits and Limiting Safety System Settings (LSSSs)," discusses incorporating LSSSs into Section 3 of the TSs (Reactor Protection System (RPS) table).

The protection and monitoring functions of the RPS have been designed to ensure safe operation of the reactor. This is achieved by specifying LSSS in terms of parameters directly monitored by the RPS, as well as LCOs on other reactor system parameters and equipment performance. *The LSSSs are defined as the Allowable Values*, which, in conjunction with the LCOs, establish the threshold for protective system action to prevent exceeding acceptable limits, including Safety Limits during design-basis accidents.

The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The allowable values are derived from the analytic limits, corrected for calibration, process, and some of the instrument errors. The trip setpoints are then determined accounting for the remaining instrument errors (e.g., drift). Trip setpoints are those predetermined values of output at which an action should take place. A channel is inoperable if its actual trip setpoint is not within its required allowable value.

The STS, Section B 3.3.1.1, explicitly explain why the allowable value is acceptable to be the LSSS. It is inadvisable to make the trip setpoint the same as the LSSS. If the trip setpoint is the same as the LSSS and the setpoint drifts, the licensee must report to the Commission and preclude it from happening again, which would be impossible. Alternatively, both a nominal trip setpoint and allowable value can be included in the TS. If it is your intention to define the trip setpoint as the LSSS, it should be clearly stated in the TS Bases. Please clarify your intentions in this regard.

ENCLOSURE

3. Exhibit A, Section II.2, "Simplify the Safety Limits and Limiting Safety System Settings," discusses a 12-inch reduction in the safety limit reference for reactor vessel water level.

Please discuss any impact on accident analyses affected by this change.

4. Exhibit A, Section II.2, "Simplify the Safety Limits and Limiting Safety System Settings," discusses converting TS units to psig from psia by subtracting "15 psi" from current TS values.

Please discuss any impact the "0.3 psi" change in margin to atmospheric pressure (14.7 psi) has on accident analyses and TS limits.

5. Please cite the NRC-approved instrumentation trip setpoint and allowable value methodologies utilized in your calculations.