

March 1, 2002

10 CFR Part 50,
Section 50.90

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Additional Information Provided in Support of Previously Submitted
License Amendment for Revised Reference for Reactor Vessel Level Setpoints,
Simplification of Safety Limits, and Improvements to the Bases (TAC NO. MB2246)

Reference 1: Nuclear Management Company, LLC letter to Nuclear Regulatory Commission, "Revised Reference Point for Reactor Vessel Level Setpoints, Simplification of Safety Limits, and Improvements to the Bases," dated June 18, 2001.

Reference 2: Nuclear Management Company, LLC letter to Nuclear Regulatory Commission, "Response to NRC Request for Additional Information Regarding License Amendment Request for Revised Reference Point for Reactor Vessel Level Setpoints, Simplification of Safety Limits, and Improvements to the Bases (TAC NO. MB2246)," dated January 30, 2002.

By Reference 1 letter, as supplemented by Reference 2, Nuclear Management Company, LLC (NMC) requested a change to the Technical Specifications (TS), Appendix A of Operating License DPR-22, for the Monticello Nuclear Generating Plant. This letter clarifies the previous submittal made by Reference 1, as supplemented by Reference 2, and provides NMCs additional justification for part of the previously submitted TS change. This additional justification is being provided for the previously proposed revision to the Safety Limit Section of the Monticello TS; no additional revised pages are required.

The Current Technical Specifications (CTS) for Monticello state that if a Safety Limit is exceeded, the reactor shall be shut down immediately. The Proposed Technical Specifications (PTS) state that with any Safety Limit violation, the following actions shall

be completed within 2 hours: A. Restore compliance with all Safety Limits; and B. Insert all insertable control rods. As stated in Reference 1 Bases for PTS 2.2, exceeding a Safety Limit may cause fuel damage and create a potential for radioactive releases in excess of 10 CFR 100, "Reactor Site Criteria," guidelines. Therefore, it is required to insert all insertable control rods and restore compliance with the Safety Limit within 2 hours. The 2 hour completion time ensures that the operators take prompt remedial action and also ensures that the probability of an accident occurring during this period is minimal. This information should have also been provided as justification for the revision to CTS as provided in the PTS submittal. Additionally, the less restrictive 2 hour completion time is also justified because it allows appropriate actions to be evaluated by the operator and completed in a timely manner. This will prevent the operator from feeling time pressured by a TS requirement which requires an immediate response and allows time to evaluate the situation before responding. This could possibly prevent a plant transient and a worse situation than was originally entered into, therefore, the 2 hour completion time to restore compliance with all Safety Limits is reasonable.

The above referenced additional justification has no technical impact on pages or justifications previously submitted. This justification is consistent with the previously proposed changes. Therefore, the Determination of No Significant Hazards Consideration and Environmental Assessment submitted by Reference 1 are also applicable to this supplemental submittal.

If you have any questions regarding this letter or the previous License Amendment Requests please contact Doug Neve, Licensing Project Manager, at (763) 295-1353.



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