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LTR. RE. OUR 12-17-75 LTR.....TRANS THE FOLL-
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ENCLOSURE

LICENSE AMENDMENT REQUEST FOR CHANGE TO TECH.
SPEC., NOTARIZED 10-1-76, COVERING THE SAFETY
RELATED HYDRAULIC SNUBBER OPERABILITY AND
SURVEILLANCE REQUIREMENTS.....

(3 SIGNED CYS. RECEIVED)

(10 PAGES)

ACKNOWLEDGED**DO NOT REMOVE**

PLANT NAME: MONTICELLO

SAFETY

FOR ACTION/INFORMATION

ENVIRO

SAB 10-5-76

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HELTEMES	AT & I		BUNCH
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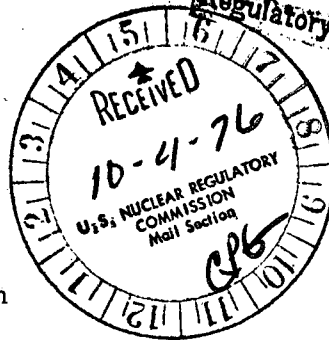
NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

October 1, 1976

Mr Victor Stello, Director
Division of Operating Reactors
U S Nuclear Regulatory Commission
Washington, DC 20555



Dear Mr Stello:

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

License Amendment Request dated October 1, 1976

Attached are three originals and 37 conformed copies of a request for change of Technical Specifications, Appendix A of the Provisional Operating License for the Monticello Nuclear Generating Plant. This change request has been reviewed by the Monticello Operations Committee and the Safety Audit Committee.

The proposed changes revise the Technical Specifications covering safety related hydraulic snubber operability and surveillance requirements to conform to the recommended Technical Specifications contained in a letter dated December 17, 1975 from Mr Dennis L Ziemann, USNRC.

We have determined that these changes do not involve an unreviewed safety question.

Yours very truly,

L O Mayer, PE
Manager, Nuclear Support Services

LOM/DMM/deb

cc: G Charnoff
J G Keppler
MPCA Attn: J W Ferman
MECCA Attn: H J Vogel
S J Gadler

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UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50- 263

REQUEST FOR AMENDMENT TO
OPERATING LICENSE NO. DPR- 22

(License Amendment Request Dated October 1, 1976)

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Technical Specifications as shown on the attachments labeled Exhibit A and Exhibit B. Exhibit A describes the proposed changes along with reasons for the change. Exhibit B is a set of Technical Specification pages incorporating the proposed changes.

This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By *L. J. Wachter*
L J Wachter
Vice President, Power Production &
System Operation

On this 1st day of October, 1976, before me a notary public in and for said County, personally appeared L J Wachter, Vice President, Power Production & System Operation, and first being duly sworn acknowledged that he is authorized to execute this document in behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

Denise E. Branaui

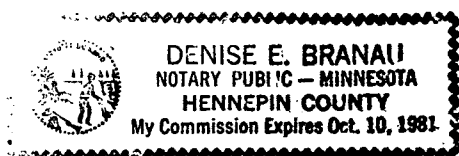


EXHIBIT A

MONTICELLO NUCLEAR GENERATING PLANT
DOCKET NOS. 50-263

LICENSE AMENDMENT REQUEST DATED OCTOBER 1, 1976

PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS
APPENDIX A OF OPERATING
LICENSE DPR-22

Pursuant to 10CFR50.59, the holders of License DPR-22 hereby propose the following changes to Appendix A, Technical Specifications:

Specifications 3.6 and 4.6 Hydraulic Snubbers

PROPOSED CHANGE

Revise Technical Specifications and Bases 3.6 and 4.6, covering safety related hydraulic snubber operability and surveillance requirements, as shown in attached Exhibit B.

REASONS FOR CHANGE

These changes in Technical Specification requirements are submitted in response to a letter dated December 17, 1975, from Mr Dennis L Ziemann, USNRC, to Mr L O Mayer, NSP.

EXHIBIT A

-2-

REASONS FOR CHANGE (continued)

This letter requested Northern States Power Company to submit a License Amendment Request to modify the Technical Specifications covering safety related hydraulic snubbers. The modifications we were requested to submit included:

- a. Specifying what must be included in visual snubber inspections.
- b. Enlarging the scope of Table TS 3.6.1 to include information on snubber area radiation levels and ease of removal.
- c. Deletion of snubbers in High Radiation Areas or snubbers "especially difficult to remove" from functional testing.

The proposed Technical Specification changes conform to the model Technical Specifications contained in Mr Ziemann's letter with the following minor exceptions:

- a. The provision for omitting from functional testing snubbers located in High Radiation Areas or snubbers "especially difficult to remove" found in the Bases has been added to the Surveillance Requirements.
- b. A specification has been added to allow snubbers to be added or deleted from the list of those located in High Radiation Areas as plant conditions change.
- c. Specification 4.6.H.3 has been deleted. It is no longer necessary to specify the time of initial inspection or the initial inspection interval. Monticello has been following this schedule for over one year.

Snubbers were classified "especially difficult to remove" if they were:

- a. Greater than 5 feet above the adjacent working platform or;
- b. Greater than 3 feet below the adjacent working platform

Snubbers were classified as being in High Radiation Areas based on a radiation survey conducted during a maintenance outage earlier this year. Radiation survey results were corrected for estimated radiation level at each snubber location approximately one week following reactor shutdown.

EXHIBIT B

LICENSE AMENDMENT REQUEST DATED OCTOBER 1, 1976

Exhibit B, attached, consists of revised and newly prepared pages of the Appendix A Technical Specifications as listed below. These pages incorporate the proposed changes.

Pages 121
121A
121B
121C
138A

Pages 121D
121E
Are deleted by these
proposed changes.

3.0 LIMITING CONDITIONS FOR OPERATION

H. Hydraulic Snubbers

1. During all modes of operation, except Cold Shutdown and Refueling Shutdown, all hydraulic snubbers listed in Table 3.6.1 shall be operable except as noted in 3.6.H.2 through 3.6.H.4 below.
2. From and after the time that a hydraulic snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable.
3. If the requirements of 3.6.H.1 and 3.6.H.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition within 36 hours.
4. If a hydraulic snubber listed in Table 3.6.1 is determined to be inoperable while the reactor is in the shutdown or refueling mode, the snubber shall be made operable prior to reactor startup.

4.0 SURVEILLANCE REQUIREMENTS

3. The diffuser to lower plenum differential pressure reading on an individual jet pump is 10% or more, less than the mean of all jet pump differential pressures.

H. Hydraulic Snubbers

The following surveillance requirements apply to all hydraulic snubbers listed in Table 3.6.1:

1. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing, or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connections to the piping and anchor to verify snubber operability in accordance with the following schedule:

No. of Snubbers Found Inoperable During Inspection or During Inspection Interval	Next Required Inspection Interval
0	18 months + 25%
1	12 months + 25%
2	6 months + 25%
3,4	124 days + 25%
5,6,7	62 days + 25%
> 8	31 days + 25%

3.0 LIMITING CONDITIONS FOR OPERATION

5. Snubbers may be added to safety related systems without prior License Amendment to Table 3.6.1 provided that safety evaluations, documentation and reporting are provided in accordance with 10CFR 50.59 and that a revision to Table 3.6.1 is included with a subsequent License Amendment request.

4.0 SURVEILLANCE REQUIREMENTS

The required inspection interval shall not be lengthened more than one step at a time.

Snubbers may be categorized in two groups, "accessible" or "inaccessible" based on their accessibility for inspection during reactor operation. These two groups may be inspected independently according to the above schedule.

2. All hydraulic snubbers whose seal materials are other than ethylene propylene or other material that has been demonstrated to be compatible with the operating environment shall be visually inspected for operability every 31 days.
3. deleted
4. Once each refueling cycle, a representative sample of 10 snubbers or approximately 10% of the snubbers, whichever is less, shall be functionally tested for operability including verification of proper piston movement, lock up, and bleed. For each unit and subsequent unit found inoperable, an additional 10% or ten snubbers shall be so tested until no more failures are found or all units have been tested. Snubbers designated in Table 3.6.1 as being especially difficult to remove or located in High Radiation Areas are exempt from this requirement.
5. Snubbers may be reclassified as being in or out of High Radiation Areas in Table 3.6.1 based on the most recent radiation survey provided that a revision to Table 3.6.1 is included with a subsequent License Amendment Request.

121A
REV

TABLE 3.6.1 (Page 1 of 2)
SAFETY RELATED HYDRAULIC SNUBBERS

SNUBBER NO.	SYSTEM	LOCATION	ELEVATION	AZIMUTH (AIRLOCK 0 REF)	HIGH RADIA- TION AREA	DIFFICULT TO REMOVE	ACCESSIBLE INACCESSIBLE-I	-A
PS1-H2	MAIN STEAM	DRYWELL	953	071			I	
PS1-H3	MAIN STEAM	DRYWELL	950	148			I	
PS2-H2	MAIN STEAM	DRYWELL	950	120			I	
PS3-H2	MAIN STEAM	DRYWELL	950	240			I	
PS4-H3	MAIN STEAM	DRYWELL	950	212			I	
RV24-H3	SAFETY-RELIEF	DRYWELL	950	110			I	
RV24-H4	SAFETY-RELIEF	DRYWELL	935	100			I	
RV24-H4A	SAFETY-RELIEF	DRYWELL	935	100			I	
RV24-H5	SAFETY-RELIEF	DRYWELL	935	110			I	
RV24A-H4A	SAFETY-RELIEF	DRYWELL	947	048		X	I	
RV24A-H7	SAFETY-RELIEF	DRYWELL	953	115			I	
RV24A-H8	SAFETY-RELIEF	DRYWELL	939	032			I	
RV25-H1	SAFETY-RELIEF	DRYWELL	953	180			I	
RV25-H1A	SAFETY-RELIEF	DRYWELL	953	180	X		I	
RV25-H2	SAFETY-RELIEF	DRYWELL	948	190		X	I	
RV25-H2A	SAFETY-RELIEF	DRYWELL	948	190		X	I	
RV25-H3	SAFETY-RELIEF	DRYWELL	934	180	X		I	
RV25A-H2	SAFETY-RELIEF	DRYWELL	945	120	X	X	I	
RV25A-H2A	SAFETY-RELIEF	DRYWELL	945	120	X	X	I	
RV25A-H7	SAFETY-RELIEF	DRYWELL	953	135			I	
RV26-H1	SAFETY-RELIEF	DRYWELL	953	200	X		I	
RV26-H1A	SAFETY-RELIEF	DRYWELL	953	200			I	
RV26-H2	SAFETY-RELIEF	DRYWELL	947	200		X	I	
RV26-H2A	SAFETY-RELIEF	DRYWELL	947	200			I	
RV26A-H2	SAFETY-RELIEF	DRYWELL	940	250			I	
RV26A-H2A	SAFETY-RELIEF	DRYWELL	935	250			I	
RV27-H1	SAFETY-RELIEF	DRYWELL	950	320			I	
RV27-H1A	SAFETY-RELIEF	DRYWELL	950	230			I	
RV27-H5	SAFETY-RELIEF	DRYWELL	945	270			I	
RV27-H6	SAFETY-RELIEF	DRYWELL	945	270			I	
RV27A-H2A	SAFETY-RELIEF	DRYWELL	953	290			I	
RV27A-H3	SAFETY-RELIEF	DRYWELL	953	290			I	
RV27A-H9	SAFETY-RELIEF	DRYWELL	938	290			I	
SS-1	MAIN STEAM	DRYWELL	953	279	X		I	
SS-1AR	RECIRCULATION	DRYWELL	922	315	X	X	I	
SS-1BR	RECIRCULATION	DRYWELL	922	135	X	X	I	
SS-11	FEEDWATER	DRYWELL	952	302			I	
SS-12	FEEDWATER	DRYWELL	952	058			I	
SS-13	FEEDWATER	DRYWELL	952	258			I	
SS-14	FEEDWATER	DRYWELL	952	096			I	
SS-17A	RHR	DRYWELL	964	072	X		I	
SS-17B	RHR	DRYWELL	964	072	X		I	
SS-18A	RHR	DRYWELL	964	288			I	
SS-18B	RHR	DRYWELL	964	288			I	
SS-19	RHR	DRYWELL	964	341			I	
SS-2	MAIN STEAM	DRYWELL	953	081	X		I	
SS-2AR	RECIRCULATION	DRYWELL	927	302	X	X	I	

TABLE 3.6.1 (Page 2 of 2)
SAFETY RELATED HYDRAULIC SNUBBERS

SNUBBER NO.	SYSTEM	LOCATION	ELEVATION	AZIMUTH (AIRLOCK 0 REF)	HIGH RADIA- TION AREA	DIFFICULT TO REMOVE	ACCESSIBLE -A INACCESSIBLE-I
SS-2BR	RECIRCULATION	DRYWELL	927	122		X	I
SS-20	RHR	DRYWELL	964	019	X		I
SS-3	MAIN STEAM	DRYWELL	950	212			I
SS-3AR	RECIRCULATION	DRYWELL	927	328		X	I
SS-3BR	RECIRCULATION	DRYWELL	927	148		X	I
SS-4	MAIN STEAM	DRYWELL	950	148			I
SS-4AR (A)	RECIRCULATION	DRYWELL	934	302			I
SS-4AR (B)	RECIRCULATION	DRYWELL	934	323			I
SS-4BR (A)	RECIRCULATION	DRYWELL	934	120			I
SS-4BR (B)	RECIRCULATION	DRYWELL	934	149			I
SS-40	HPCI	MAIN STEAM CHASE					I
SS-5AR	RECIRCULATION	DRYWELL	941	315		X	I
SS-5BR	RECIRCULATION	DRYWELL	941	135		X	I
SS-6AR	RECIRCULATION	DRYWELL	953	261	X		I
SS-6BR	RECIRCULATION	DRYWELL	953	099	X		I
SS-7	MAIN STEAM	DRYWELL	953	240	X		I
SS-7AR	RECIRCULATION	DRYWELL	953	323			I
SS-7BR	RECIRCULATION	DRYWELL	953	032			I
SS-8	MAIN STEAM	DRYWELL	953	120	X		I
SS-8AR	RECIRCULATION	DRYWELL	927	270		X	I
SS-8BR	RECIRCULATION	DRYWELL	927	090		X	I
SS-21	RHR	TORUS FL LV - S WALL					A
SS-22	RHR	TORUS FL LV - S WALL					A
SS-23	RHR	B RHR ROOM FL LV					A
SS-24	RHR	A RHR ROOM FL LV					A
SS-25	RHR	TORUS CATWK-SE WALL					A
SS-26	CORE SPRAY	B RHR ROOM FL LVL					A
SS-27	CORE SPRAY	B RHR ROOM FL LVL					A
SS-28A	CORE SPRAY	A RHR ROOM FL LVL					A
SS-28B	CORE SPRAY	A RHR ROOM FL LVL					A
SS-29	RHR	OVER N2 ANALYZER	954			X	A
SS-30	RHR	OVER N2 ANALYZER	954			X	A
SS-31	RHR	TORUS CATWK					A
SS-32A	RHR	A RHR ROOM - BY HX	916			X	A
SS-32B	RHR	A RHR ROOM - BY HX	916			X	A
SS-33	RHR	ABOVE TORUS					A
SS-34	RHR	ABOVE TORUS					A
SS-35	HPCI	HPCI ROOM - N WALL	912			X	A
SS-36A	HPCI	HPCI ROOM - FL LVL					A
SS-36B	HPCI	HPCI ROOM - FL LVL					A
SS-37	HPCI	HPCI ROOM - W WALL	905			X	A
SS-38A	RCIC	RCIC ROOM - W WALL	906			X	A
SS-38B	RCIC	RCIC ROOM - W WALL	906			X	A
SS-41	CORE SPRAY	ABOVE TORUS CATWK	927				A
SS-42	HPCI	ABOVE TORUS RING HDR	906				A

H. Hydraulic Snubbers (contd.)

Examination of defective snubbers at reactor facilities and material tests performed at several laboratories has shown that millable gum polyurethane deteriorates rapidly under the temperature and moisture conditions present in many snubber locations. Although molded polyurethane exhibits greater resistance to these conditions, it also may be unsuitable for application in the higher temperature environments. Data are not currently available to precisely define an upper temperature limit for the molded polyurethane. Lab tests and in-plant experience indicate that seal materials are available, primarily ethylene propylene compounds, which should give satisfactory performance under the most severe conditions expected in reactor installations.

To further increase the assurance of snubber reliability, functional tests should be performed once each refueling cycle. These tests will include stroking of the snubbers to verify proper piston movement, lock-up and bleed. Ten percent or ten snubbers, whichever is less, represents an adequate sample for such tests. Observed failures on these samples should require testing of additional units. Snubbers in High Radiation Areas or those especially difficult to remove need not be selected for functional tests provided operability was previously verified. Snubbers are considered especially difficult to remove if they (1) have a rated capacity greater than 50,000 lb, (2) are located greater than 5 feet above the adjacent platform, or (3) located greater than 3 feet below the adjacent platform.