

50-263

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D. K. DavisFROM:
Northern States Power Co.
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PLANT NAME: RBT 7/25/77DISTRIBUTION OF FIRE PROTECTION INFO PER
S. SHEPPARD 9-22-76 FOR OPERATING REACTORS**ACKNOWLEDGED**

ENCLOSURE

Request that the interim fire protection
Tech Specs be based on the 1/31/77
license amendment request and that the
minor areas of departure from the
current guidance be resolved through
discussion or meetings.
2p

SAFETY

FOR ACTION/INFORMATION

BRANCH CHIEF:

PROJECT MANAGER:

LIC. ASST:

Davis (7)

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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

July 20, 1977

Regulatory

File CV



Mr D K Davis, Acting Chief
Operating Reactors Branch No. 2
Division of Operating Reactors
c/o Distribution Services Branch, DDC, ADM
U S Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr Davis:

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

Fire Protection Technical Specification Changes

In a License Amendment Request dated January 31, 1977, Northern States Power Company submitted proposed changes to the Monticello Technical Specifications to incorporate fire protection limiting conditions for operation, surveillance requirements, and administrative controls. The proposed changes were based on guidance provided to us in a letter from D L Ziemann, Chief, Operating Reactors Branch, No. 2, dated December 6, 1976. In a recent letter from you dated June 24, 1977, we were informed that the NRC Staff has revised their guidance in this area. Revised model Technical Specifications were provided to us and we were requested to resubmit our Technical Specification change request in accordance with the new guidance within 20 days of receipt of your letter.

We have reviewed the latest model fire protection Technical Specifications and find that it is not necessary to resubmit our Technical Specification change request. Our reasons are:

- 1) Those deficiencies in the original model Technical Specifications which prompted them to be rewritten were identified during our review. Deficient portions of the model Technical Specifications were extensively revised before being included in our Technical Specification change request of January 31, 1977. As a result, our original submittal is generally consistent with your latest recommendations.
- 2) There are a small number of areas where our proposed Technical Specifications continue to depart from your revised model Technical Specifications. We

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NORTHERN STATES POWER COMPANY

Mr D K Davis
Page 2
July 20, 1977

have strong objections to your recommendations in these areas and have noted many of them in our January 31, 1977 submittal. In addition, your latest model Technical Specifications contain a number of new reporting requirements which appear to be inconsistent with the reporting guidelines contained in Regulatory Guide 1.16 and in our current Technical Specifications. We believe that inoperable fire protection equipment and deficiencies in implementation of the fire protection program should be reported in accordance with the existing guidelines. The latest model Technical Specifications contain reporting requirements for fire protection systems which are more stringent than the existing reporting requirements applicable to ECCS systems.

- 3) It is not possible to complete and submit a Technical Specification change request within 20 days except in those extraordinary cases where plant safety or availability are immediately threatened. The Commission's regulations require Technical Specification change submittals to be in the form of a License Amendment Request. The requirements of 10CFR50 and the Administrative Controls Section of the Technical Specifications require extensive review and approval of all such requests. Between 15 and 20 individuals are directly involved in drafting, reviewing, and approving each Technical Specification Change Request. Many man-hours were required to complete work on our January 31, 1977 submittal.

We ask that the interim fire protection Technical Specifications issued for the Monticello Plant be based on our January 31, 1977 License Amendment Request. We believe that the minor areas of departure from the current guidance can be resolved through discussion or meetings without the more extensive man-power commitment required for another License Amendment Request.

Yours very truly,



L O Mayer, PE
Manager of Nuclear Support Services

LOM/DMM/deh

cc: J G Keppler
G Charnoff
MPCA-Attn: J W Ferman