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SUBJECT: Provides revs to 900402 inservice testing program relief requests, necessary to make program consistent w/positions of Generic Ltr 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." per 910724 request.

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Northern States Power Company

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October 3, 1991

Generic Letter 89-04

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

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

Revisions to Previously Submitted
Inservice Testing Relief Requests

In a letter dated April 2, 1990, NSP submitted three Inservice Testing Program Relief Requests (Relief Request Numbers ESW-1, SC-1 & CRD-3) that were necessary to make the Monticello program consistent with the positions contained in Generic Letter 89-04 "Guidance on Developing Acceptable Inservice Testing Programs". Questions generated by NRC review of those relief requests were discussed by Messrs J Colaccino and E Sullivan of the NRC and Mr P Tobin of NSP via telephone on July 24, 1991. As a result of that discussion, the following agreed upon actions are taken:

1. Relief Request Number ESW-1:

ESW-1 has been rewritten to clarify that NSP is only asking for permission to test the affected valves in pairs. The revised Relief Request is Included as Exhibit A to this letter.

2. Relief Request Number SC-1:

Relief request SC-1 will remain worded as submitted by NSP in the April 2, 1991 letter, per the July 24, 1991 conversation.

3. Relief Request Number CRD-3:

Based on discussion of the scope and intent of the Generic Letter 89-04 position, it was concluded that Relief Request CRD-3 was not needed. Accordingly, Relief Request CRD-3 is hereby withdrawn.

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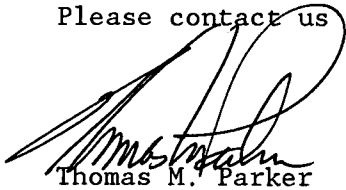
October 3, 1991

Page 2

Northern States Power Company

Minor administrative changes to our second 10 year interval Inservice Inspection and Testing Program will be needed to reflect the above items, however, we wish to defer submittal of the revised program until January of 1992. Changes to the Inservice Inspection portion of our second 10 year program are also pending and the brief delay will allow us to avoid making two separate submittals.

Please contact us if you require additional information.



Thomas M. Parker
Manager
Nuclear Support Services

cc: Regional Administrator-III, NRC
NRR Project Manager, NRC
Resident Inspector, NRC
J Silberg

Exhibit A: Relief Request Number ESW-1

RELIEF REQUEST NUMBER ESW-1

System: Emergency Service Water

Valves: SW-101, SW-102, SW-103, SW-104

Category: C-1

Class: 3

Function: To prevent diversion of ESW flow to non-safety related systems.

Impractical Test Requirements: Individual valve closure testing per IWV-3520

Basis for Relief: Each pair off valves, SW-101/SW-102 and SW-103/SW-104 are in series with no test taps installed between them. Safety function is assured if either one of the pair of valves will provide safety function. This means that testing of the pair of valves will verify system safety function.

Alternative Testing: Test each pair of valves, SW-101/SW-102 and SW-103/SW-104 quarterly by venting upstream of each pair.