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ACCESSION NBR: 9303090454 DOC. DATE: 93/03/02 NOTARIZED: NO DOCKET #
FACIL: 50-263 Monticello Nuclear Generating Plant, Northern States 05000263
AUTH. NAME AUTHOR AFFILIATION
PARKER, T.M. Northern States Power Co.
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Requests approval to modify commitment made in
correspondence dtd 911122 to NRC concerning implementation of
guidance provided in Regulatory Guide 1.155 & compliance to
Station Blackout Rule.

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Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

March 2, 1993

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

10 CFR Part 50
Section 50.63(c)(4)

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

Modification of Commitment for
Station Blackout Containment Isolation (TAC No. M68569)

We request approval to modify a commitment made in our correspondence dated November 22, 1991 to the Nuclear Regulatory Commission concerning implementation of guidance provided in Regulatory Guide 1.155 and compliance to the Station Blackout Rule.

In our November 22, 1991 correspondence we committed that;

We will ensure that appropriate containment integrity, per regulatory Guide 1.155, Section 3.2.7 can be demonstrated for containment isolation valves that do not meet the exclusion criteria stated therein. Confirmation of valve closure will also be ensured. This demonstration will include containment isolation valves that we had previously excluded based on our exemption of those valves from 10 CFR 50 Appendix J testing.

We have reevaluated the containment isolation valves of concern, including valves which we had previously excluded based on exemption from 10 CFR 50 Appendix J testing. Based on our reevaluation we have identified valves which cannot be excluded based solely on the criteria of Regulatory Guide 1.155, but for which inclusion in plant procedures to ensure confirmation of valve closure would not be required based on additional exclusion criteria which has been evaluated as acceptable by the NRC staff in Safety Evaluation Reports provided to other licensees.

Identification of the valves which we propose to remove from consideration for valve position indication and closure independent of preferred Class 1E power supplies and specific application of our additional proposed exclusion criteria is provided in Attachment 1.

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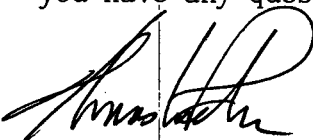
NORTHERN STATES POWER COMPANY

In summary we propose to commit to the following:

We will ensure that appropriate containment integrity, per regulatory Guide 1.155, Section 3.2.7 can be demonstrated for containment isolation valves that do not meet the exclusion criteria stated therein or the following additional criteria:

- 1) Interlocked valves that are closed during normal operation and remain closed during a station blackout.
- 2) Valves that are required by station procedures to be closed during normal operation at all times (except for brief intervals during testing) and are expected to remain closed during a station blackout, provided position indication is available in the control room prior to the station blackout.
- 3) Valves in radioactive closed loops that are not expected to be breached during a station blackout provided these loops a) connect directly to the suppression pool, b) are provided with a single isolation valve, c) are always submerged thereby preventing the escape of containment atmosphere and d) where the piping outside containment constitutes a closed system providing a second isolation barrier following a single active failure.

Plant procedures addressing station blackout will ensure confirmation of valve closure for valves identified in Attachment 1 until approval of this revised commitment by the NRC staff. Please contact Marv Engen at (612) 295-1291 if you have any question related to this proposed commitment revision.



Thomas M Parker
Director
Nuclear Licensing

c: Regional Administrator - III, NRC
NRR Project Manager, NRC
Sr Resident Inspector, NRC
State of Minnesota
Attn: Kris Sanda
J Silberg

Attachment 1) Identification of Valves and Exclusion Criteria

Identification of Valves and Exclusion Criteria

The containment isolation valves for the following penetrations are to be excluded based on the valves being interlocked closed during normal operation and the valves remaining closed during a station blackout:

<u>Penetration</u>	<u>Valves</u>	<u>Description</u>
X-13A	MO-2013/2015	RHR Injection
X-13B	MO-2012/2014	RHR Injection
X-16A	MO-1752/1754	CS Injection
X-16B	MO-1751/1753	CS Injection

Similar exclusion criteria had previously been reviewed and found acceptable by the NRC staff in the Station Blackout Safety Evaluation Report for the Shearon Harris Nuclear Power Plant, Unit 1. The inboard containment isolation valves for the above penetrations are electronically interlocked closed when the reactor is at normal operating pressure. The inboard and outboard containment isolation valves are also interlocked so that the inboard containment isolation valve can only be opened if the outboard containment isolation valve is closed. Therefore, interlocks exist such that when the reactor is at normal operating pressure, one of the two containment isolation valves for each line will always be closed. Since it is assumed that the reactor is at normal operating pressure at the onset of station blackout, then one of the containment isolation valves in each line will be closed at the onset the event. These motor operated valves are AC powered and will not change position during a station blackout. Therefore during a station blackout, at least one containment isolation valve in each line will be closed and appropriate containment integrity is demonstrated for the four lines.

The following containment isolation valves are to be excluded due to the valves being required by station procedures to be closed during normal operation at all times (except for brief intervals during testing), the valves are expected to remain closed during a station blackout, and have position indication available in the control room prior to the station blackout:

<u>Penetration</u>	<u>Valves</u>	<u>Description</u>
X-39A	MO-2021/2023	Drywell Spray
X-39B	MO-2020/2022	Drywell Spray
X-211A	MO-2011/2007	Torus Spray
X-211B	MO-2010/2006	Torus Spray

Identification of Valves and Exclusion Criteria

Similar exclusion criteria had previously been reviewed and found acceptable by the NRC staff in the Station Blackout Safety Evaluation Reports for Fort Calhoun Unit 1, River Bend Station Unit 1, Grand Gulf Nuclear Station, and the San Onofre Nuclear Generating Station Units 2 and 3. These containment isolation valves are checked closed during pre-startup valve lineups. These containment isolation valves are normally closed and only opened during surveillance testing. During testing, only one containment isolation valve per line is opened at a time (one containment isolation valve for each penetration is closed at all times during operation). The only time these containment isolation valves are opened for other than surveillance testing is by the Emergency Operating Procedures. Since these valves are for the Drywell and Torus Spray lines, they should never be opened during normal operation. These valves are not required to be operated to cope with a Station Blackout event and would therefore remain closed during the event.

The following containment isolation valves are to be excluded based on the valves being in radioactive closed loops that are not expected to be breached during a station blackout provided these loops: a) connect directly to the suppression pool, b) are provided with a single isolation valve, c) are always submerged thereby preventing the escape of containment atmosphere and d) where the piping outside containment constitutes a closed system providing a second isolation barrier following a single active failure.

<u>Penetration Valves</u>		<u>Description</u>
X-224A	MO-1987	RHR Suction
X-224B	MO-1986	RHR Suction
X-226A	MO-1742	CS Suction
X-226B	MO-1741	CS Suction
X-210A	MO-2009	RHR Test Line to Torus
	MO-1750	No. 12 CS Test Return Line
X-210B	RHR-8-2	(These are valves for lines that meet the exclusion criteria of Reg Guide 1.155)
	CS-10-2	
X-210B	MO-2008	RHR Test Line to Torus
	MO-1749	No. 11 CS Test Return Line
	RHR-8-1	(These are valves for lines that meet the exclusion criteria of Reg Guide 1.155)
	CS-10-1	

Identification of Valves and Exclusion Criteria

Similar exclusion criteria had previously been reviewed and found acceptable by the NRC staff in the Station Blackout Safety Evaluation Report for Washington Public Power Supply System (WNP-2). We have determined that the Core Spray and RHR piping outside containment constitutes a closed system. Numerous lines branch off the main lines of the Core Spray and RHR systems. These branch lines could compromise the interpretation of these systems as closed systems. In the absence of a specific definition of a "closed system", the following reasoning was used. The system was considered a "closed system" as long as each branch line that connected to the line which terminated below the level of the suppression pool, met the exclusion criteria for containment isolation valves in NUMARC 87-00 and NRC Regulatory Guide 1.155, or terminated in a containment isolation valve that had the capability for valve position indication and closure independent of the preferred Class 1E power supplies.