



NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

February 9, 1979

Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

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

Appendix I Technical Specifications

In his letter dated November 15, 1978, Mr Brian K Grimes furnished a revised Draft Radiological Effluent Technical Specifications (NUREG-0473, BWR) for guidance in developing changes to our Technical Specifications to incorporate the requirements of Appendix I. This document was extensively revised from the original draft furnished in July 1978. One major difference in the new specifications is allowance for an Offsite Dose Calculation Manual (ODCM) to be prepared by the licensee and to serve as a companion document to the Technical Specifications.

In late November and early December, a series of seminars were conducted at the NRC Regional Offices to provide additional guidance for licensees in developing Technical Specifications for the new Appendix I requirements. Personnel from our organization attended the seminar at the Region III Office and were led to believe that, at the conclusion of the several seminars, there would be further written guidance based on information conveyed by the various licensees. Several weeks ago, the Atomic Industrial Forum (AIF) convened a group of licensees for the purpose of gathering additional comments on the subject and, we understand, information from this meeting was conveyed to NRC Staff members. Regarding the ODCM document, as recently as February 2 we received a document from NRC, dated January 18, providing further guidance on the general contents of the ODCM. According to this guidance, the scope of the ODCM had been expanded beyond the original intent and yesterday we learned that the guidance therefore will be revised and reissued to the licensees at a later date.

Mr Grimes' letter of November 15 included a submittal schedule calling for submission of the Monticello Technical Specifications by February 13, 1979 (90 days from date of NRC letter). Due to the fragmentary nature and lateness of the guidance for development of the Appendix I Technical Specifications, we will not meet this February 13 submittal date. Based on the assumption that clarifying guidance is in the immediate offing, and taking into account the need for several levels of document review for quality assurance purposes, we expect to submit an appropriate License Amendment Request for Appendix I Technical Specifications by May 1, 1979.

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cc: J G Keppler
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