



Monticello Nuclear Generating Plant
2807 W County Road 75
Monticello, MN 55362

February 14, 2017

L-MT-17-009
10 CFR 50.54(q)(5)
10 CFR 72.44(f)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket 50-263
Renewed Facility Operating License No. DPR-22

Change to the Monticello Nuclear Generating Plant (MNGP) Emergency Plan

Pursuant to 10 CFR 50.54(q)(5) and 10 CFR 72.44(f), Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, submits a summary of changes to a MNGP Emergency Plan Implementing Procedure (EPIP) as Enclosure 1. The new revision to the EPIP is provided in Enclosure 2. The EPIP changes have been reviewed and do not result in a reduction in the effectiveness of the Emergency Plan.

Enclosure 2 contains company confidential information considered to be Sensitive Unclassified Non-Safeguards Information (SUNSI). Pursuant to 10 CFR 2.390(d)(1), NSPM requests the enclosure be withheld from public disclosure.

Summary of Commitments

There are no new commitments and no revisions to existing commitments in this letter.

A handwritten signature in black ink, appearing to read 'Peter A. Gardner'.

Peter A. Gardner
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power Company – Minnesota

Enclosures (2)

cc: Emergency Response Coordinator, Region III, USNRC (with Enclosures)
Resident Inspector, MNGP, USNRC (with Enclosure 1)
Administrator, Region III, USNRC (w/o Enclosures)
Chief, Plant Support Branch, Division of Reactor Safety, Region III, USNRC
(with Enclosure 1)
Director, Division of Spent Fuel Management, Office of Nuclear Material Safety and
Safeguards (with Enclosure 1)

ENCLOSURE 1

Monticello Nuclear Generating Plant Summary of Changes – 10 CFR 50.54(q)(5)

Description (Executive Summary)

A.2-110 (Response to a Security Threat or Hostile Action), Section 6.2, is being revised to include steps for the Shift Manager to ensure the Emergency Response Organization (ERO) is activated for the following conditions:

- If a Notice of an Unusual Event (NUE) has been declared and it has been determined that ERO augmentation is desired per Shift Manager's discretion.
- If an Alert, Site Area Emergency (SAE) or General Emergency (GE) has been declared.

This revision is in support of a general process change to no longer automatically activate the ERO for a security related NUE. Going forward, the ERO will only be activated at an NUE classification level if the Shift Manager (SM)/Interim Emergency Director (ED) has determined it is desired based on the nature of the event. The site made this decision based on the following:

- At an NUE level, the on-shift personnel are sufficiently capable of addressing the event.
- The nature of NUE events are such that they do not require augmented ERO staffing, in most cases. However, the option is available to the decision maker as needed.
- At an NUE level, the Joint Information Center (JIC) and State Emergency Operation Center (EOC) do not activate. Therefore, NUE response would not include full offsite augmentation.

This process change is considered a change to the Emergency Plan and will be evaluated further to determine if it would be a reduction in plan effectiveness or require prior NRC approval.

Change (1)

Description:

Section 6.2

Verbiage before the change:

6.2.5 Ensure the ERO pager network is activated per the security related activation instructions in 5790-102-04 (EMERGENCY CALL LIST - NUE) or 5790-104-04 (EMERGENCY CALL LIST - ALERT/SITE AREA/GENERAL).

Verbiage after the change:

6.2.5 IF an NUE has been declared, and it has been determined that ERO augmentation is desired per Shift Manager's discretion, THEN ensure the ERO is activated per the security related activation instructions in 5790-102-04 (EMERGENCY CALL LIST - NUE).

6.2.6 IF an Alert, SAE or GE has been declared, THEN ensure the ERO is activated per the security related activation instructions in 5790-104-04 (EMERGENCY CALL LIST - ALERT/SITE AREA/GENERAL).

Emergency Plan Effectiveness Basis:

This change does not reduce the site's ability to effectively implement the Emergency Plan during a response to a security related or other type of emergency.

The evolution of changes in site processes and procedures for the detection of and response to security events implemented since 2001 have eliminated the need for default ERO activation at the NUE level based on a Security event. The conclusion is the use of the current Emergency Classification Level (ECL) definitions and Security Emergency Action Limit (EALs) of NRC Bulletin 2005-02 and implemented in 2006, provide an equivalent if not more conservative approach for response to security related events than was in place in 2001 without the need for ERO activation at an NUE. The current NUE level security related emergencies are conditions of a lower risk threshold and do not warrant ERO augmentation as was the case in 2001.

In addition, the procedure change described above will not add significant time to the Shift Manager's or the Shift Emergency Communicator's expected actions, nor will it result in added complexity to either role. Based on the above Emergency Plan description for Notification of Unusual Event and the purpose for the class, the NUE ERO activation process after this change will continue to support placing the operations personnel in a state of readiness and systematic handling of related information and decision-making. Regardless of the SM's decision to augment the entire ERO, the process will still include notifications sent to select ERO members, corporate communications personnel and Emergency Preparedness staff. This will further support the Emergency Plan by placing key ERO decision makers and other stakeholders in a state of awareness prior to any potential emergency classification escalations.