

SECTION 13 PLANT OPERATIONS

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SECTION 13 PLANT OPERATIONS**13.1 Summary Description**

Xcel Energy and Northern States Power Company, a Minnesota corporation have experienced plant personnel that are qualified to perform plant operations and plant maintenance that are necessary for safe operation of the plant.

Training programs are scheduled and implemented to maintain sufficient licensed operators and a competent supporting technical staff. Plant activities are conducted in accordance with Quality Assurance, Emergency, and Security Plans and written procedures implemented in response to regulatory requirements. Inspection and testing are conducted in accordance with a program which meets regulatory requirements.

13.2 Organization, Responsibilities, and Qualifications**13.2.1 Organization**

The Monticello Nuclear Generating Plant site management and organization including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specifications 5.2.1.a are described in NSPM-1, "Quality Assurance Topical Report".

In support of the individual responsibilities of plant personnel, an Plant Operating Review Committee (further described in Section 13.6.2) provides multi-discipline review of various plant activities.

The onsite organization includes the technically trained personnel necessary to support all aspects of plant operations.

13.2.2 Duties, Responsibilities and Qualification of the Operating Staff Personnel

The responsibilities and duties of key site and plant operating staff personnel are described in NSPM-1.

13.3 Personnel Experience and Training**13.3.1 Experience of Initial Plant Supervisory Personnel**

Senior Operator licensed personnel from the Pathfinder Nuclear Plant organization were assigned to supervisory positions for the Monticello plant during initial plant operation. All participated in the pre-operational testing, fuel loading, startup testing and operation of the Pathfinder plant.

SECTION 13 PLANT OPERATIONS**13.3.2 Experience and Training of Plant and Site Staff**

Minimum qualifications and training requirements for plant staff (i.e., operating personnel) are contained in training programs approved by the Nuclear Regulatory Commission. An NRC approved training program is one that is based on the systems approach to training (SAT) and has been accredited by the National Nuclear Accrediting Board (NNAB) (Reference 13 and Reference 14).

Each member of the plant and site staff **SHALL** meet or exceed the minimum qualifications of ANSI N18.1-1971 (Reference 25) for comparable positions. Exceptions to these standards are documented in the Technical Specifications.

Training enhancements required by NUREG-0737, item I.A.2.1.4, are in place as well as training in mitigating core damage required by Item II.B.4.1 (Reference 2).

13.3.3 Personnel Behavior

The "Fitness for Duty Program" applies to all nuclear generation personnel, including all badged contract workers and craft union personnel hired by Xcel Energy, NSPM, or its contractors. It recognizes that fatigue, stress, illness and temporary physical impairments, as well as drug and alcohol abuse, can have a negative effect on a worker's fitness and jeopardize safe operations.

All personnel badged for unescorted access to the plant are subject to random drug and alcohol testing, and are trained to be observant of co-worker or visitor behavior that may indicate a fitness for duty concern. Supervisors are trained to be observant of employee behavior that might indicate excessive fatigue or unhealthy behavior patterns and to bar employees from working if they appear unfit for duty. The NSPM Fitness for Duty program meets all of the requirements of 10CFR26 (see Reference 24).

13.4 Operational Procedures**13.4.1 General**

A preoperational test program was conducted to assure that all systems and equipment function properly. The initial preoperational and startup test programs are described in Appendix D. General Electric and Bechtel provided written procedures and technical direction for these programs. The plant operating staff participated in the preparation and execution of these tests.

Detailed written procedures, including the applicable check-off sheets and instructions were prepared in accordance with the Technical Specifications and ANSI N18.7-1976 (Reference 28). Currently the QATR, NSPM-1 (Reference 66) governs the detailed written procedures. Plant operations are conducted in accordance with these procedures.

SECTION 13 PLANT OPERATIONS**13.4.2 Procedure Development**

The original operations procedures were written by members of the plant staff with the technical assistance of General Electric and were reviewed by the Operations Committee.

Procedures are periodically updated to reflect plant modifications and improvements in methods of operation as operating experience accumulates.

Special written procedures for one-of-a-kind operations are occasionally necessary. These are prepared by qualified personnel and are reviewed by the Operations Committee. The Operations Committee may also submit these for review by the Safety Audit Committee.

Maintenance and test procedures, checklists, and other necessary records to satisfy routine inspections, preventive maintenance programs, and license requirements, have been and will continue to be developed by qualified personnel.

13.4.3 Emergency Plan

In any emergency situation at Monticello, the initial response would be made by the plant staff and, if needed, by local support agencies. It is expected that the initial response would have to extend for a period of hours, by which time the plant staff would be augmented by other segments of the overall NSPM emergency response organization. Once all centers are activated and the emergency organization is at full strength, the scope of the plant staff response will be reduced to the immediate plant site activities. The Monticello Nuclear Generating Plant Emergency Plan was submitted according to the new 10CFR50 emergency planning regulations on February 6, 1981. Subsequent revisions to the plan are issued and reported to the NRC in accordance with 10CFR50.54(q).

The NRC has concluded that onsite and offsite emergency preparedness is adequate and that the emergency plans have been upgraded in accordance with NUREG-0737 Item III.A.2.1 (Reference 1).

The plan is directed toward the following areas:

- a. Organization and actions within the plant to control and limit the consequences of an accident.
- b. Organization and actions controlling site and initial offsite activities in the event of an uncontrolled release of radioactive material. This includes notification of and coordination with required offsite support agencies.
- c. Identifying and evaluating the consequences of accidents that may occur and affect the public and plant personnel.
- d. Describing the protective action levels and actions that are required to protect the public and plant personnel in the event of an accident.
- e. Considerations necessary for the purposes of re-entry and recovery.

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- f. Arrangements required for medical support in the event of injury.
- g. The training necessary to assure adequate response to emergencies.

The Emergency Plan identifies the location of primary and backup Emergency Operations Facilities (EOF). The primary EOF is located in the Training Building one mile from the containment. The backup EOF is located 45 miles from the plant in conjunction with the Xcel Energy Corporate Headquarters in downtown Minneapolis. The location of the EOFs was found acceptable by the NRC documented in a letter dated October 27, 1983 (Reference 29).

The Emergency Plan is dependent upon the Emergency Plan Implementing Procedures for implementation. Implementing Procedures were initially submitted to the NRC on February 27, 1981 (Reference 30). Revisions to procedures are issued and reported to the NRC in accordance with 10CFR50, Appendix E, Section V.

13.4.4 Security Plan

The security plan consists of documents referred to as the Monticello Nuclear Generating Plant Physical Security Plan as approved by the NRC via Amendment 58 to Facility Operating License DPR-22, dated December 13, 1988 and Cyber Security Plan for NSPM as approved by the NRC via Amendments 166 and 186 to the Renewed Facility Operating License DPR-22. The security plans are periodically revised to meet changing requirements. Revisions to the security plans, not requiring prior NRC approval, are issued and reported to the NRC in accordance with 10CFR50.54(p).

13.4.5 Quality Assurance Plan

Xcel Energy's nuclear plant operational activities were conducted under the Operational Quality Assurance (QA) Plan (Reference 31). Now the operational activities are conducted under the current revision of the Northern States Power Company-Minnesota QATR, NSPM-1. The QATR describes the quality assurance program and how it satisfies the applicable regulations and guidelines. It also contains the duties, responsibilities and authority of those individuals and groups involved in carrying out activities required by the QA program.

The Northern States Power Company-Minnesota QATR, NSPM-1 (Reference 66) is responsive to the requirements of Appendix B to 10CFR50. The Quality Assurance Plan is periodically revised to meet changing requirements and the current revision is maintained on file at the plant and corporate headquarters.

SECTION 13 PLANT OPERATIONS**13.4.6 10CFR50.55a Inservice Inspection and Testing Programs**

Inservice Inspection (ISI) of components and their supports equivalent to ASME Code Classes 1, 2, 3 are performed in accordance with the Monticello Nuclear Generating Plant ASME Code Section XI Inservice Inspection Program for the Fifth ISI Interval. Inservice Inspection (ISI) of the metal containment (MC) components are performed in accordance with the Monticello Nuclear Generating Plant ASME Code Section XI Containment Inspection Program for the Second IWE Interval. Testing and examinations are performed in accordance with formal administrative work instructions (AWIs). The ISI Program is composed of two inspection plans:

- a. The ISI Plan is submitted to the NRC for review and filing. (Reference 60). The Fifth ISI Interval runs from September 1, 2012 through May 31, 2022. When practical, the tests and examinations conform to ASME Code, Section XI, 2007 Edition with Addenda through 2008 (Reference 65) as specified in 10CFR50.55a(g).
- b. The Metal Containment Examination Plan (IWE) is maintained on site available for review. The Second IWE Interval runs from September 9, 2009 through September 8, 2018. When practical, the tests and examinations conform to ASME Code, Section XI, 2001 Edition with the 2003 Addenda (Reference 64) as specified in 10CFR50.55a(g).

Inservice Testing (IST) of program pumps and valves equivalent to ASME Code Classes 1, 2 and 3 are performed in accordance with the Monticello Pump and Valve IST Program Plan for the Fifth Ten-Year IST Interval (December 13, 2012 through May 31, 2022) (Reference 61) in accordance with the Plan's ASME Operation and Maintenance (OM) Codes of Record (Reference 63). Testing of IST Program pumps and valves is performed in accordance with formal administrative work instructions (AWIs). IST component testing complies with the following Code of Record:

- a. When practical, the tests conform to ASME OM Code, 2004 Edition with Addenda through 2006 for program pumps, power operated valves and pressure relief devices.

Preservice and inservice examination and testing of dynamic restraints (snubbers) required to perform a specific function in shutting down the reactor to safe shutdown condition, in maintaining the safe shutdown conditions, or in mitigating the consequences of an accident are performed in accordance with the Monticello Snubber IST Program Plan for the Fifth Ten-Year IST Interval (December 13, 2012 through May 31, 2022) (Reference 62) in accordance with the Plan's ASME Operation and Maintenance (OM) Codes of Record (Reference 63). Testing and examinations are performed in accordance with formal administrative work instructions (AWIs). IST component testing for snubbers complies with the following Code of Record:

- a. When practical, the tests conform to ASME OM Code, 2004 Edition with Addenda through 2006, subsections ISTA & ISTD.

SECTION 13 PLANT OPERATIONS**13.4.7 Post-Scram Review**

As a result of a failure of scram circuit breakers at the Salem Nuclear Power Plant, the NRC requested all operating plants to initiate an in-depth review into four areas: (1) Post-Scram Review, (2) Equipment Classification and Vendor Interface, (3) Post-Maintenance Testing, and (4) Reactor Trip System Reliability. The NRC requirements were described in Generic Letter 83-28 (Reference 44).

Northern States Power Company completed a review of the generic implications of the event at the Salem Plant, as required by the Generic Letter and submitted the results of this review to the NRC.

One of the key lessons learned from the Salem event was the need for a comprehensive post-scram review prior to returning the unit to service. The Monticello post-scram review program specifies:

- a. Criteria for determining acceptability of restart.
- b. Qualifications, responsibilities, and authorities of personnel who perform the review and analysis.
- c. Methods and criteria for comparing event information with known or expected plant behavior.
- d. Criteria for determining need for independent assessment of an event.
- e. Procedures to ensure that all physical evidence necessary for an independent assessment is preserved.
- f. Systematic safety assessment program to assess unscheduled plant scrams.

The NRC's review and acceptance of the Monticello post-scram review program is reflected in their July 3, 1985 Safety Evaluation Report (Reference 7) of NSP's November 14, 1983 response to Generic Letter 83-28 Item 1.1 (Reference 6).

The Monticello post-scram review program includes the following data and information capability:

- a. Equipment to record the sequence of events and time history data needed for post-scram review.
- b. Established and identified parameters to be monitored and recorded for post-scram review.
- c. Means for storage and retrieval of information gathered by the sequence of events and time history recorders, and for the presentation of this information for post-scram review and analysis.
- d. Data and information used during post-scram review retention for the life of the plant.

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The NRC's review and acceptance of the Monticello post-scam data and availability is reflected in their June 2, 1986 Safety Evaluation Report (Reference 10) of NSP's November 14, 1983 (Reference 6) and May 5, 1986 (Reference 9) responses to Generic Letter 83-28 Item 1.2.

Generic Letter 83-28, Item 2.1 required NSP to confirm that all components required to trip the reactor are properly identified as safety related in all plant documentation and to confirm that an interface is established and maintained with the vendors of these components through a program of periodic communications. The NRC's review and acceptance of NSP's November 14, 1983 (Reference 6) and June 9, 1988 (Reference 56) submittals is reflected in their February 13, 1989 Safety Evaluation Report (Reference 16).

Generic Letter 83-28, Item 2.2, Part 1, required NSP to describe the Monticello program for classifying and identifying safety related components other than those in the Reactor Trip System. The NRC's review and acceptance of NSP's November 14, 1983 (Reference 6), March 31, 1987 (Reference 55) and June 9, 1988 (Reference 56) responses is reflected in their September 15, 1989 Safety Evaluation Report, (Reference 17). Generic Letter 90-03 (Reference 57) relaxed the NRC position stated in Generic Letter 83-28, Item 2.2, Part 2, relative to the interface with vendors of these components. The NRC acknowledged NSP's September 25, 1990 (Reference 22) commitment to implement the guidance in Generic Letter 90-03 in an October 10, 1990 letter (Reference 23).

Generic Letter 83-28, Item 3.1 and 3.2 required NSP to assure that post maintenance operability testing of reactor trip system and other associated components is performed in accordance with vendor and engineering recommendations to demonstrate that all safety related equipment is capable of performing its safety functions before being returned to service. The NRC's review and acceptance of NSP's November 14, 1983 (Reference 6), December 30, 1983 (Reference 52), December 26, 1984 (Reference 8) and February 28, 1986 (Reference 53) submittals is reflected in their May 2, 1986 (Reference 54) and March 21, 1986 (Reference 11) Safety Evaluation Reports.

Generic Letter 83-28, Item 4.5 requires on-line functional testing of the reactor trip system, including the scram pilot solenoid valves and initiating circuitry. In its November 14, 1983 submittal (Reference 6), NSP affirmed that such testing was being performed with the exception of the backup scram valves which are tested as part of the plant restart testing for each refueling outage. The NRC's March 21, 1986 Safety Evaluation Report (Reference 11) found Monticello's review of part 4.5.1 acceptable. The NRC found Monticello's review part 4.5.2 acceptable in its January 27, 1989 Safety Evaluation Report (Reference 18). Monticello endorsed (Reference 19) the BWR Owners Group resolution of part 4.5.1 as documented in General Electric Topical Report No. NEDC-30844 (Reference 45). The NRC staff concluded that the intervals for on-line functional testing at Monticello are consistent with achieving high reactor trip system availability (Reference 20).

SECTION 13 PLANT OPERATIONS**13.5 Operational Records and Reporting Requirements****13.5.1 Records of Initial Tests**

All preoperational procedures, test data, and reports are kept on file at the plant site.

Complete records of the plant startup tests are kept at the plant site in the test file. These records include:

- a. Startup test procedures. This is the final, as run, test procedure, including approvals and data sheets.
- b. Pertinent recorder charts and log sheets.
- c. Test reports - This includes any reports prepared by NSP, GE or Bechtel.

13.5.2 Routine Operation

Operating, maintenance and testing records and logs are kept on file in accordance with the Technical Specifications, Federal Regulations and NSP policy.

13.5.3 Abnormal Operation

In the event of any unusual, unexplained, or potentially unsafe occurrence, appropriate members of the plant staff will be assigned to conduct an investigation and prepare a report. Instructions for conducting investigation and the report format are outlined in plant administrative procedures. A complete file of investigation reports is maintained.

13.5.4 Reporting Requirements

Reports will be submitted to the Commission to satisfy the requirements of Title 10, Code of Federal Regulations, and the Monticello Technical Specifications.

13.5.5 Radiographs

Microfilmed Radiographs of piping system welds meet the requirements of ASME Section III, Paragraph NCA-4134.17, Quality Assurance Records (Reference 46) and ASME Section XI, Paragraph 1WA-6320, Reproduction and Microfilming (Reference 47 and 15).

SECTION 13 PLANT OPERATIONS**13.6 Operational Review and Audits****13.6.1 General**

Review of facility operations is performed by the Management and Safety Review Committee (MSRC) and/or the Plant Operating Review Committee (PORC).

13.6.2 Plant Operating Review Committee

The function of the committee is to review and evaluate proposed tests, modifications to plant systems or equipment, changes in plant normal or emergency procedures, certain plant events and other activities having nuclear safety significance. Detailed discussions of committee membership, frequency of meetings, authority, responsibilities, procedural requirements and record management are defined in the applicable section of the QATR.

13.6.3 Management and Safety Review Committee

The Management and Safety Review Committee (MSRC) is an independent review group whose basic responsibility is to advise NSPM management on the nuclear safety of plant operations. This Committee continuously reviews information on plant activities and periodically meets as a group to discuss this information. Detailed discussions of committee membership, qualifications, frequency of meetings, authority, responsibilities, audits, procedural requirements and record management were originally defined in the applicable section of the OQAP. Current practices are defined in the Management and Safety Review Committee (MSRC) Procedure.

13.7 Emergency Procedures

Monticello Emergency Operating Procedures (EOPs) and Severe Accident Management Guidelines (SAMGs) have been developed to satisfy the guidance contained in:

- Supplement 1 to NUREG-0737 (Reference 58)
- Section 5 of Nuclear Energy Institute (NEI) Report 91-04, Revision 1 (Reference 59)

Revisions to the EOPs and SAMGs are processed in accordance with the guidance provided in the NRC's April 17, 1990 Safety Evaluation Report (Reference 21) regarding the Monticello Procedures Generation Package submitted in response to Generic Letter 82-33 (Reference 49).

The Monticello EOPs allow operators to take actions immediately. Early operator actions taken in accordance with the EOPs enhance the ability to mitigate the consequences of events. Should the operator not take actions immediately, the plant will remain within the margins established by the design basis analysis because the automatic plant systems will still respond as designed.

SECTION 13 PLANT OPERATIONS**13.8 References**

1. NRC (D B Vassallo) letter to NSP (D M Musolf), "NUREG-0737 Item III.A.2.1 Emergency Plan Upgrade to Meet Rule", dated May 18, 1983.
2. NRC (D B Vassallo) letter to NSP (D M Musolf), "NUREG-0737 Item I.A.2.1.4 Upgrading of RO and SRO Training, Item II.B.4 Training for Mitigating Core Damage", dated June 3, 1983.
3. Deleted.
4. Deleted.
5. Deleted.
6. NSP (D M Musolf) letter to the NRC, "Generic Implications of Salem ATWS Events (Generic Letter 83-28)", dated November 14, 1983.
7. NRC (D B Vassallo) letter to NSP (D M Musolf), "Generic Letter 83-28, Item 1.1 - Post-Trip Review", dated July 3, 1985.
8. NSP (D M Musolf) letter to the NRC, "Generic Implications of Salem ATWS Events (Generic Letter 83-28)", dated December 26, 1984.
9. NSP (D M Musolf) letter to the NRC, "Additional Information Related to Generic Letter 83-28, Item 1.2.", dated May 5, 1986.
10. NRC (R Auluck) letter to NSP (D M Musolf), "Generic Letter 83-28, Item 1.2, Post-Trip Review (TAC 53608)", dated June 2, 1986.
11. NRC (J A Zwolinski) letter to NSP (D M Musolf), "Safety Evaluation - Generic Letter 83-28, Items 3.1.1, 3.1.2 and 4.5.1 (TAC 52937, 54084)", dated March 21, 1986.
12. Deleted.
13. NSP (D M Musolf) letter to the NRC, "NRC License Operator Training Program and Licensed Operator Requalification Program", dated March 21, 1988.
14. NSP (D M Musolf) letter to the NRC, "Shift Technical Advisor Training", dated April 8, 1988.
15. NRC (J J Harrison) letter to NSP (C E Larson), Special Safety Inspection Report No. 263/88022(DRS), dated November 28, 1988.
16. NRC (J J Stefano) letter to NSP (D M Musolf), "Acceptability of Monticello Nuclear Generating Plant Programs Required by NRC Generic Letter 83-28, Item 2.1 (Parts 1 and 2) TAC No. 52856", dated February 13, 1989.

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17. NRC (W O Long) letter to NSP (T M Parker), "Safety Evaluation for Item 2.2 (Part 1) of Generic Letter 83-28, Equipment Classification (Programs for all Safety-Related Components) TAC No. 53691", dated September 15, 1989.
18. NRC (J J Stefano) letter to NSP (D M Musolf), "Safety Evaluation for Generic Letter 83-28, Item 4.5.2 (Reactor Trip System Reliability on-line Testing) TAC No. 54001", dated January 27, 1988.
19. NSP (D M Musolf) letter to the NRC, "Additional Information Related to Generic Letter 83-28 Item 4.5.3 Applicability of General Electric Topical Report NEDC-30844", dated June 17, 1988.
20. NRC (J J Stefano) letter to NSP (T M Parker), "Safety Evaluation for Generic Letter 83-28, Item 4.5.3, Reactor Trip Reliability-On-Line Functional Testing of the Reactor Trip System (TAC No. 54001)", dated June 7, 1989.
21. NRC (W O Long) letter to NSP (T M Parker), "Procedures Generation Package - Safety Evaluation Report (TAC No. 44317)", dated April 17, 1990.
22. NSP (T M Parker) letter to the NRC, "Response to Generic Letter 90-03, Relaxation of Staff Position in Generic Letter 83-28, Item 2.2 Part 2 - Vendor Interface for Safety-Related Components", dated September 25, 1990.
23. NRC (W O Long) letter to NSP (T M Parker), "Response to Generic Letter 90-03 for Monticello Nuclear Generating Plant (TAC No. 76260)" dated October 10, 1990.
24. NSP (C E Larson) letter to the NRC, "Certification of Compliance to 10 CFR 26 Fitness for Duty Program", dated January 3, 1990.
25. American National Standard, ANSI N18.1 - 1971, "Selection and Training of Nuclear Plant Personnel".
26. Deleted.
27. Deleted.
28. American National Standard ANSI N18.7 -1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants", approved February 19, 1976.
29. NRC (D G Eisenhower) letter to NSP (D M Musolf), "Primary and Backup Emergency Operations Facilities", dated October 27, 1983.
30. NSP (L O Mayer) letter to the NRC, "Emergency Response Plan Implementing Procedures", dated February 27, 1981.
31. NSP "Operational Quality Assurance Plan", Revision 2, November 15, 1977.
32. NRC (D K Davis) letter to NSP (L O Mayer), "Operation Quality Assurance Program, Revision 2", dated December 29, 1977.

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- 33. Deleted.
- 34. Deleted.
- 35. Deleted.
- 36. Deleted.
- 37. Deleted.
- 38. Deleted.
- 39. Deleted.
- 40. Deleted.
- 41. Deleted.
- 42. Deleted
- 43. Deleted.
- 44. NRC (D G Eisenhower) Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", dated July 8, 1983.
- 45. General Electric report NEDC-30844A, "BWR Owners Group Responses to NRC Generic Letter 83-28, Item 4.5.3", March 1988.
- 46. ASME Boiler & Pressure Vessel Code, Section III, Paragraph NCA-4134.17, Quality Assurance Records.
- 47. ASME Boiler & Pressure Vessel Code, Section XI, Paragraph IWA-6320, Reproduction, Digitization, and Microfilming.
- 48. Deleted.
- 49. NSP (D M Musolf) letter to the NRC, "Emergency Operating Procedures Generation Package Submittal", dated July 31, 1984.
- 50. Deleted.
- 51. Deleted.
- 52. NSP (D M Musolf) letter to the NRC, "Generic Implications of Salem ATWS Events (Generic Letter 83-28)", dated December 30, 1983.
- 53. NSP (D M. Musolf) letter to the NRC, "Generic Letter 83-28, Salem Action Plant, Item 3.2, Check of Vendor and Engineering Recommendations", dated February 28, 1986.

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54. NRC (J A Zwolinski) letter to NSP (D. M. Musolf), "Safety Evaluation - Generic Letter 83-28, Items 3.2.1 and 3.2.2 (TAC 53774)", dated May 2, 1986.
55. NSP (D M. Musolf) letter to the NRC, "Response to NRC Request for Further Information on NSP Response to Generic Letter 83-28, Item 2.2.1", dated March 31, 1987.
56. NSP (D M Musolf) letter to the NRC, "Additional Information Related to Generic Letter 83-28", dated June 9, 1988.
57. NRC (J G Partlow) Generic Letter 90-03, "Relaxation of Staff Position in Generic Letter 83-28, Item 2.3 Part 2 - Vendor Interface for Safety Related Components, Generic Letter 83-28", dated March 20, 1990.
58. NRC (D G Eisenhutt) Generic Letter 82-33, "Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability", December 17, 1982.
59. Nuclear Energy Institute (NEI) Report 91-04, Revision 1, "Severe Accident Issue Closure Guidelines", dated December 1994.
60. NSPM letter to the NRC, "Fifth Ten-Year Inservice Inspection Plan", dated February 28, 2012.
61. NSPM letter to the NRC, "Pump & Valve In-Service Testing Program Plan, Fifth Interval-Revision 1", dated December 12, 2012.
62. NSPM letter to the NRC, "In-service Testing (IST) Program Plan for Safety Related Seismic Restraints (Snubbers) for the Fifth 10-Year Interval", dated November 30, 2012.
63. ASME Operation and Maintenance Code, 2004 Edition with Addenda through 2006.
64. ASME Boiler & Pressure Vessel Code, Section XI "Rules for Inservice Inspection of Nuclear Power Plant Components," 2001 Edition with the 2003 Addenda.
65. ASME Boiler & Pressure Vessel Code, Section XI "Rules for Inservice Inspection of Nuclear Power Plant Components," 2007 Edition with Addenda through 2008.
66. Quality Assurance Topical Report (QATR), NSPM-1.
67. Transmittal of Monticello Emergency Plan, Revision 21, dated August 15, 2002.