

Regulatory Docket File

UNITED STATES NUCLEAR REGULATORY COMMISSION

~~Secret~~ N/Ltr Dated 1-30-76

NORTHERN STATES POWER COMPANY  
MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

REQUEST FOR AMENDMENT TO  
OPERATING LICENSE NO. DPR- 22  
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(License Amendment Request Dated January 30, 1976)

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Technical Specifications as shown on the attachments labeled Exhibit A and Exhibit B. Exhibit A describes the proposed changes along with reasons for the change. Exhibit B is a set of Technical Specification pages incorporating the proposed changes.

This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By *L. J. Wachter*  
L J Wachter  
Vice President, Power Production &  
System Operation

On this 30th day of January, 1976, before me a notary public in and for said County, personally appeared L J Wachter, Vice President, Power Production & System Operation, and first being duly sworn acknowledged that he is authorized to execute this document in behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

*Denise E. Branau*



## EXHIBIT A

### MONTICELLO NUCLEAR GENERATING PLANT DOCKET NO. 50-263

LICENSE AMENDMENT REQUEST DATED JANUARY 30, 1976

#### PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS, APPENDIX A OF PROVISIONAL OPERATING LICENSE DPR-22

Pursuant to 10 CFR 50.59, the holders of Provisional Operating License DPR-22 hereby propose the following changes to the Appendix A Technical Specifications:

#### Specification and Bases 3.7/4.7.A - Primary Containment

##### PROPOSED CHANGES

1. Add new Limiting Conditions for Operation and Surveillance Requirements for primary containment leakage testing. The proposed new specifications appear on pages 140 through 143 of Exhibit B.
2. Redesignate existing specifications 3/4.7.A.3 through 3/4.7.A.6 as specifications 3.7/4.7.A.5 through 3.7/4.7.A.8. These changes appear on pages 144 through 148 of Exhibit B. Page 147A will be deleted by these changes.
3. Revise Table 3.7.1 to include automatic isolation valves smaller than 2 inches in diameter which were omitted from the original table. The proposed new table appears on pages 153, 154, and 154A of Exhibit B.
4. Add new Table 4.7.1, "Monticello Containment Penetrations," as shown on pages 154B through 154 O of Exhibit B. This table lists all Type B and Type C testing requirements.
5. Revise the "List of Tables" in the front of the Monticello Technical Specifications to reflect the change in the title of Table 3.7.1 and the inclusion of the new Table 4.7.1.

##### REASONS FOR CHANGES

In a letter from Mr. K. R. Goller, Division of Reactor Licensing, USNRC, to Mr. L. O. Mayer, NSP, dated August 13, 1975, NSP was requested to determine if containment leakage testing at the Monticello Nuclear Generating Plant conforms to 10 CFR 50, Appendix J. NSP was specifically asked to identify any design features that do not permit conformance with the requirements of Appendix J or any existing Technical Specifications that are less restrictive than Appendix J. A preliminary response to this request was contained in a letter from Mr. L. O. Mayer, NSP, to Mr. K. R. Goller, USNRC, dated September 19, 1975. This letter outlined the following actions and schedule

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to attain conformance to Appendix J:

- a. A License Amendment Request to be submitted by December 31, 1975 (later rescheduled for January 30, 1976) to revise the Monticello Technical Specifications to conform to Appendix J in those areas where plant design permits.
- b. An analysis, to be submitted by March 31, 1976, of systems containing isolation valves which require Type C tests in accordance with the definition contained in Section II.H of Appendix J, but which are not testable. Appropriate design changes will be proposed or a request for exemption from the requirements of Appendix J will be included in conformance with 10 CFR 50.12.

The Technical Specification changes proposed in this License Amendment Request satisfy the first of the two commitments made in our letter of September 19, 1975.

The proposed changes contained in Exhibit B revise the Technical Specifications to remove conflicts with 10 CFR 50, Appendix J. The proposed wording is similar to the wording used in the Technical Specifications of recently licensed BWR's conforming to Appendix J. With the exception of the following clarifying remarks, no further justification for these changes is necessary.

- a. Proposed specification 4.7.A.3.a permits NSP to determine an  $L_t$  value for the Monticello containment at the next refueling outage and to conduct future leakage tests at a reduced pressure of  $P_t=0.5P_a$ . This  $L_t$  determination is normally completed during the initial integrated leakage test conducted as part of a plant's preoperational testing program. Existing Technical Specifications have required testing at  $P_a$ ; therefore an  $L_t$  value was not determined during the initial test at Monticello. For purposes of scheduling future integrated leakage tests, the test conducted during the next refueling outage would constitute the preoperational Type A leakage rate test specified in Appendix J.
- b. Proposed specifications 3.7.A.3.C and 4.7.A.3.f would permit testing of main steam isolation valves at 25 psig. As discussed in the proposed 4.7 Bases on page 163 of Exhibit B, testing of these valves at  $P_a$  is not feasible and there is no substantial benefit to be gained from testing at  $P_a$ .
- c. Proposed specification 4.7.A.4.a permits overall pressure testing of the air lock every three days when the air lock is in use. This is a reasonable surveillance requirement to verify correct door sealing when the air lock is actually in use. Gasket leakage tests are not possible since Monticello air lock doors are not equipped with double gaskets.
- d. Table 3.7.1 has been revised to include automatic isolation valves in containment penetrations smaller than two inches in diameter. These penetrations were omitted from the original

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table. Table 3.7.1 has also been revised to list isolation valve identification numbers.

- e. Table 4.7.1 is a new table that has been included in the proposed Technical Specification changes as a guide in performing Type B and Type C tests. All containment penetrations are listed along with the sealing device or isolation valves in each penetration and the testing required for each.

In cases where conflicts in the table exist and a Type C test is specified for a valve which is not testable in place, the valve is identified as not testable. These conflicts will be resolved in the NSP analysis to be submitted by March 31, 1976 with either a request for waiver from the requirements of Appendix J or proposed modifications to permit testing.

SAFETY EVALUATION

This License Amendment Request is being submitted at the request of the Commission to remove the current conflicts between the surveillance requirements for containment leakage testing in the Monticello Technical Specifications and in 10 CFR 50, Appendix J. The proposed changes revise the Monticello Technical Specifications to conform to Appendix J in all areas where plant design permits. Where possible, the proposed changes follow the wording used in Technical Specifications issued for BWR's currently being licensed and whose testing programs conform to Appendix J.