

NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

August 15, 1975

Mr A Giambusso, Director
Division of Reactor Licensing
U S Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr Giambusso:

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

License Amendment Request Dated August 15, 1975

Attached are three signed originals and 37 conformed copies of a request for a change of Technical Specifications, Appendix A, of Operating License DPR-22. This request is submitted in response to a letter dated July 11, 1975, from Mr Dennis L Ziemann, Chief, Operating Reactors Branch 2, Directorate of Licensing, USNRC, which requested that we submit an application for an amendment to our license containing proposed technical specifications covering operability and surveillance of hydraulic snubbers on safety related systems.

The model technical specifications included with the July 11, 1975, NRC letter, and those proposed herein, contain a requirement that the initial inspection of hydraulic snubbers shall be performed within 6 months from the date of issuance of the technical specifications. A refueling outage is scheduled at the Monticello Nuclear Plant commencing September 12, 1975, and an inspection of safety related hydraulic snubbers will be conducted during that outage. In order that we might avoid an unnecessary subsequent outage solely for performance of the initial inspection, it is requested that the license amendment be issued prior to September 12, 1975. If this schedule cannot reasonably be accommodated, it is requested that the license amendment authorize use of the September-October, 1975 snubber inspection for compliance with the initial inspection requirement and entry into the table of inspection intervals.

We have verbally communicated our comments to the Regulatory Staff on the inflexibilities created by inclusion of tables of either safety related or non-safety related snubbers in the Technical Specifications, which can be changed only by the formal License Amendment procedure. We have summarized these comments, along with a suggested alternate approach, in the explanation of the proposed Technical Specification changes. During those discussions, we were asked to submit a separate list of non-safety related snubbers; these are listed in Attachment A to this letter.

NORTHERN STATES POWER COMPANY

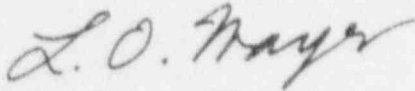
Mr A Giambusso

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This License Amendment Request has been reviewed by the Monticello Operations Committee and the Monticello Safety Audit Committee. We have concluded that the proposed changes do not involve an unreviewed safety question.

Yours very truly,



L O Mayer, PE

Manager of Nuclear Support Services

LOM/ak

cc: J G Keppler
G Charnoff
Minnesota Pollution Control Agency
Attn: J W Ferman
MECCA
Attn: H J Vogel
City of St Paul
Attn: D L Ficker
S J Gadler

Attachments

ATTACHMENT A

(NSP to NRC Letter Dated August 15, 1975)

Monticello Nuclear Generating Plant
Tabulation of Hydraulic Snubbers
that are not Safety Related

<u>Snubber No.</u>	<u>Location - System - Elevation</u>
SS-43*	Southeast Condenser Area - Off Gas System (Dilution Steam) 917'
SS-44*	Southeast Condenser Area - Off Gas System (Dilution Steam) 914'
SS-9*	RFP Area - Feedwater 927'
SS-9A*	East Condenser Area - Feedwater 924'
SS-9B*	East Condenser Area - Feedwater 924'
SHP-101-SS1*	West Turbine Mezzanine Area- Off Gas (Dilution Steam) 945'
RV-27-H7**	Drywell - Safety Relief 945' Az 2700

* All these snubbers are outside of primary containment isolation and are located on sections of piping that are not safety related.

** This snubber was listed in the October 1, 1974 letter from L. O. Mayer of NSP to J. F. O'Leary of AEC as being in place on a Safety/Relief line; it has since been removed.