AMENDMENT REQUEST DATED APRIL 1, 1975

EXHIBIT B

This exhibit consists of the following pages revised to incorporate the proposed Technical Specification changes:

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3.0 LIMITING CONDITIONS FOR OPERATION

6. If the specifications of 3.7.A cannot be met, the reactor shall be placed in a cold shutdown condition within 24 hours.

B. Standby Gas Treatment System

1. Except as specified in Specification 3.7.B.3 below, both circuits of the standby gas treatment system and the diesel generators required for operation of such circuits shall be operable at all times when secondary containment integrity is required.

2. a. The results of the in-place DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show ≥ 99% DOP removal for particles having a mean diameter of 0.7 microns and > 99% halogenated hydrocarbon removal.

b. The results of laboratory carbon sample analysis shall show ≥ 95% radioactive methyl iodide removal at a velocity of 40 feet/min ± 20%, 0.5 to 1.5 mg/m³ inlet methyl iodide concentration, ≥ 70% R.H., and ≥ 100°F.

4.0 SURVEILLANCE REQUIREMENTS

B. Standby Gas Treatment System

1. At least once per operating cycle, the following conditions shall be demonstrated.

a. Pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches of water at the system design flow rate.

b. Inlet heater is operable with a power output of at least 18 KW.

2. a. The tests and sample analysis of Specification 3.7.B.2 shall be performed initially and at least once per year for standby service or after every 720 hours of system operation and following significant painting, fire or chemical release in any ventilation zone communicating with the system.

b. DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.

3.0 LIMITING CONDITIONS FOR OPERATION

3. From and after the date that one circuit of the standby gas treatment system is made or found to be inoperable for any reason, reactor operation and fuel handling is permissible only during the succeeding seven days unless such circuit is sooner made operable, provided that during such seven days all active components of the other standby gas treatment circuit shall be operable.

4. If these conditions cannot be met, procedures shall be initiated immediately to establish reactor conditions for which the standby gas treatment system is not required.

4.0 SURVEILLANCE REQUIREMENTS

c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.

3. a. At least once per operating cycle automatic initiation of each branch of the standby gas treatment system shall be demonstrated.

b. When one circuit of the standby gas treatment system becomes inoperable the other circuit shall be demonstrated to be operable immediately and daily thereafter.

Bases Continued:

3.7 A. Primary Containment (contd)

system, leak inspections are scheduled during startup periods when the primary system is at or near rated operating temperature and pressure. The 2-hour period to provide inerting is judged to be sufficient to perform the leak inspection and establish the required oxygen concentration. The primary containment is normally slightly pressurized during periods of reactor operation. Nitrogen used for inerting could leak out of the containment, but it could not leak in to increase oxygen concentration. Once the containment is filled with nitrogen to the required concentration, no monitoring of oxygen concentration is necessary. However, at least once a week the oxygen concentration will be determined as added assurance.

B. Standby Gas Treatment System

The standby gas treatment system is designed to filter and exhaust the reactor building atmosphere to the stack during secondary containment isolation conditions, with a minimum release of radioactive material from the reactor building to the environs. Both standby gas treatment systems are designed to automatically start upon containment isolation and to maintain the reactor building pressure to approximately a negative 1/4 inch water gauge pressure; all leakage should be in-leakage. Each of the two fans has 100% capacity. Reference Section 5.3.2 FSAR. If one standby gas treatment system circuit is inoperable, the other circuit must be tested daily. This substantiates the availability of the operable circuit and results in no added risk; thus, reactor operation or refueling operation can continue. If neither circuit is operable, the plant is brought to a condition where the system is not required.

High efficiency particulate absolute (HEPA) filters are installed before and after the charcoal adsorbers to minimize potential release of particulates to the environment and to prevent clogging of the iodine adsorbers. The charcoal adsorbers are installed to reduce the potential release of radioiodine to the environment. The in-place test results should indicate a HEPA filter leakage of less than 1% through DOP testing and a charcoal adsorber leakage of less than 1% through halogenated hydrocarbon testing. The laboratory carbon sample test results should indicate a radioactive methyl iodide removal efficiency of at least 95% for expected accident conditions. The satisfactory completion of these periodic tests combined with the qualification testing conducted on new filters and adsorber provide a high level of assurance that the Standby Gas Treatment System will perform as predicted in the safety analyses and that accident off-site doses will be substantially below 10CFR100 guidelines.

Bases

4.7.B. Standby Gas Treatment System

Pressure drop across the combined HEPA filters and charcoal adsorbers of less than 6 inches of water at the system design flow rate will indicate that the filters and adsorbers are not clogged by excessive amounts of foreign matter. Heater capability and pressure drop across the filters and adsorbers is determined at least once per operating cycle to show system performance capability.

The frequency of tests and sample analysis are necessary to show that the HEPA filters and charcoal adsorber can perform as evaluated. Tests of the charcoal adsorber with halogenated hydrocarbon refrigerant shall be performed in accordance with USAEC Report DP-1082. Iodine removal efficiency tests shall follow RDT Standard M-16-1T. A charcoal adsorber tray which can accomodate a sufficient number of representative adsorber sample modules for estimating the amount of penetration of the system adsorbent through its life is currently under development. When this tray is available, sample modules will be installed with the same batch characteristics as the test adsorbent and will be withdrawn for the annual methyl iodide removal efficiency tests. Each module withdrawn will be replaced or blocked off. Until these trays can be installed, to guarantee a representative adsorbent sample, procedures should allow for the removal of a tray containing the oldest batch of adsorbent in each circuit, emptying of one bed from the tray, mixing the adsorbent thoroughly, and obtaining at least two samples. Each sample should be at least two inches in diameter and a length equal to the thickness of the bed. One sample will be submitted for laboratory analysis and the other held as a backup. If test results are unacceptable, all adsorbent in the system shall be replaced. Adsorbent in the tray removed for sampling shall be renewed. Tests of HEPA filters with DOP aerosol shall be performed in accordance with ANSI N101.1-1972. Any HEPA filters found defective shall be replaced. Replacement charcoal adsorber and HEPA filters shall be qualified in accordance with the intent of Regulatory Guide 1.52 - June, 1973.

If significant painting, fire or chemical release occurs such that the HEPA filter or charcoal could become contaminated from the fumes, chemicals or foreign material, the same tests and sample analysis shall be performed as required for operational use. The determination of significant shall be made by the shift supervisor after consulting knowledgeable staff members.

Demonstration of the automatic initiation capability of each circuit is necessary to assure system performance capability. If one standby gas treatment system is inoperable, the other system must be tested daily. This substantiates the availability of the operable system and thus reactor operation or refueling operation can continue for a limited period of time.

Bases Continued:

4.7 C. Secondary Containment

Initiating reactor building isolation and operation of the standby gas treatment system to maintain at least a 1/4 inch of water vacuum within the secondary containment provides an adequate test of the operation of the reactor building isolation valves, leakage tightness of the reactor building, and performance of the standby gas treatment system. Functionally testing the initiating sensors and associated trip channels demonstrates the capability for automatic actuation. Performing these tests prior to refueling will demonstrate secondary containment capability prior to the time the primary containment is opened for refueling. Performing the tests gives sufficient confidence of reactor building integrity and standby gas treatment system performance capability.

D. Primary Containment Isolation Valves

These large pipes comprising a portion of the reactor coolant system whose failure could result in uncovering the reactor core are supplied with automatic isolation valves (except those lines needed for emergency core cooling system operation or containment cooling). The closure times specified herein are adequate to prevent loss of more coolant from the circumferential rupture of any of these lines outside the containment than from a steam line rupture. Therefore, this isolation valve closure time is sufficient to prevent uncovering the core.

In order to assure that the doses that may result from a steam line break do not exceed the 10 CFR 100 guidelines, it is necessary that no fuel rod perforation resulting from the accident occur prior to closure of the main steam line isolation valves. Analyses suggest that fuel rod cladding perforations would be avoided for main steam valve closure times, including instrument delay, as long as 10.5 seconds. However, for added margin the Technical Specifications require a valve closure time of not greater than 5 seconds.

The primary containment isolation valves are highly reliable, have low service requirement, and most are normally closed. The initiating sensors and associated trip channels are also checked to demonstrate the capability for automatic isolation. Reference Section 5.2.2.4.3 and Table 5-2-3 FSAR. The test interval of once per operating cycle for automatic initiation results in a failure probability of 1.1×10^{-2} that a line will not isolate. More frequent testing for valve operability results in a more reliable system.

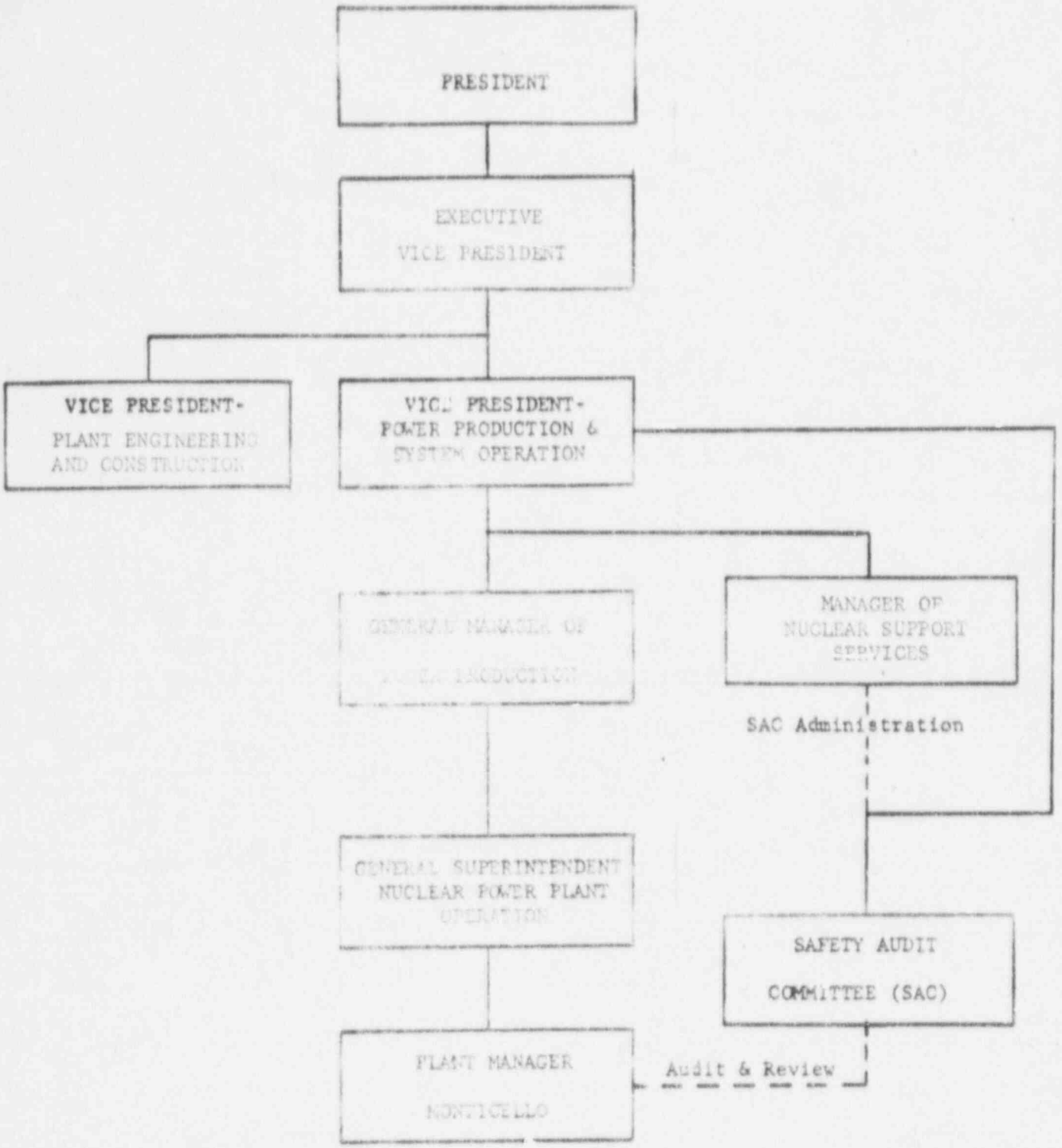
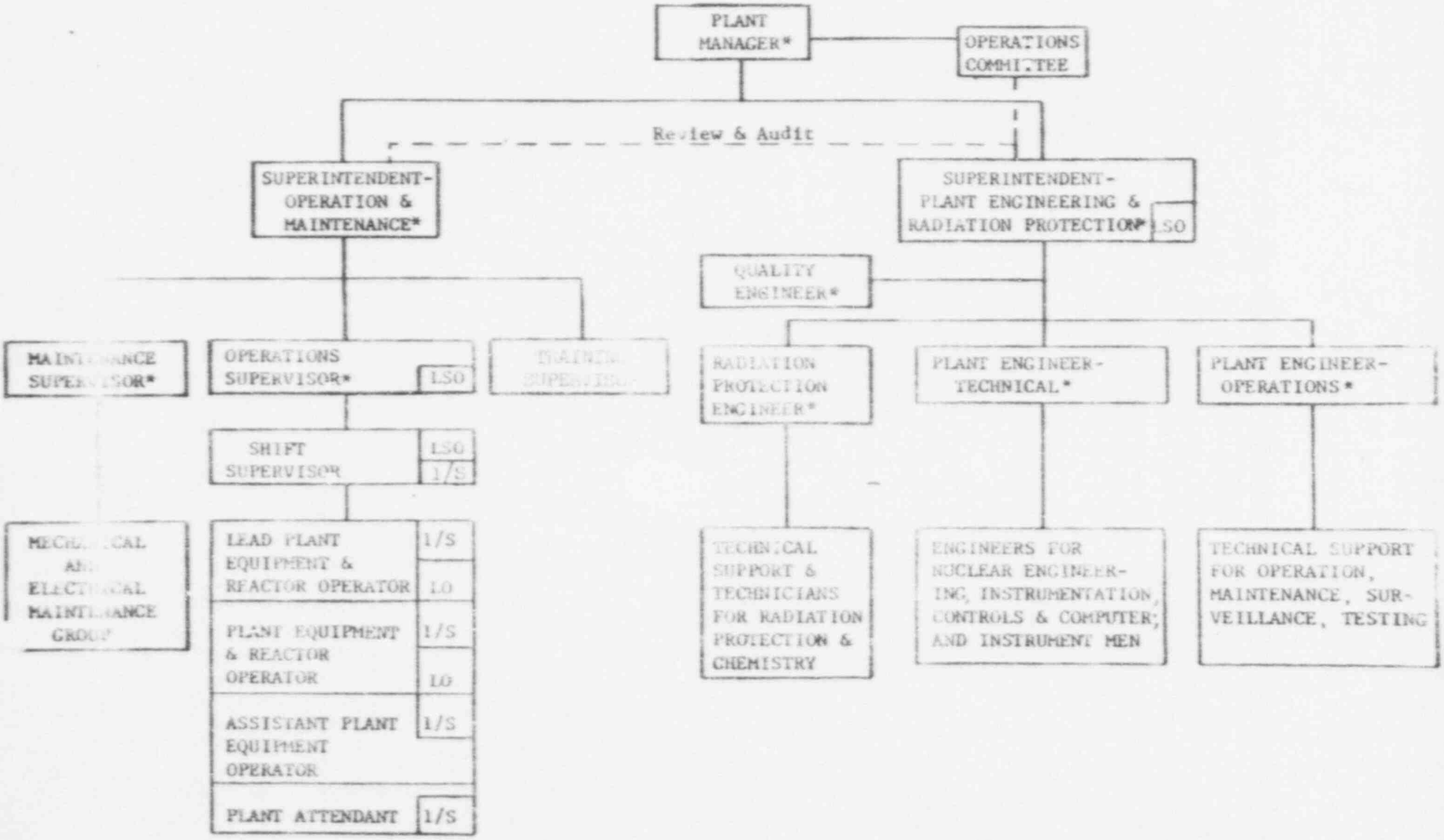


FIGURE 6.1.1

NSP CORPORATE ORGANIZATIONAL

RELATIONSHIP TO ON-SITE OPERATING ORGANIZATION



CODE:
- * - Key Supervisor
- 1/S - one/shift
- LO - Licensed Operator
- LSO - Licensed Senior Operator

MONTICELLO NUCLEAR GENERATING PLANT
Functional Organization For
On-Site Operating Group

FIGURE 6.1.2

6.2 Review and Audit

Organizational units for the review and audit of facility operations shall be constituted and have the responsibilities and authorities outlined below:

A. Safety Audit Committee (SAC)

The Safety Audit Committee provides the independent review of plant operations from a nuclear safety standpoint. Audits of plant operation are conducted under the cognizance of the SAC.

1. Membership

a. The SAC shall consist of at least five (5) persons.

b. The SAC Chairman shall be an NSP management representative appointed by the Vice President - Power Production & System Operation. Other SAC members shall be appointed by the Vice President - Power Production & System Operation or by such other person as he may designate. The Chairman shall appoint a Vice Chairman from the SAC membership to act in his absence.

c. No more than two members of the SAC shall be from groups holding line responsibility for operation of the plant.

d. A SAC member may appoint an alternate to serve in his absence, with concurrence of the Chairman. No more than two alternates shall serve on the SAC at any one time. The alternate members shall have voting rights.

2. Qualifications

a. The SAC members should collectively have the capability required to review activities in the following areas: nuclear power plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, instrumentation and control, radiological safety, mechanical and electrical engineering, and other appropriate fields associated with the unique characteristics of the nuclear power plant involved.

b. When the nature of a particular problem dictates, special consultants will be utilized, as necessary, to provide expert advice to the SAC.

3. Meeting Frequency

The SAC shall meet on call by the Chairman but not less frequently than twice a year.

4. Quorum

a. No less than a majority of the permanent members or their alternates, including the SAC Chairman or Vice Chairman.

b. No more than a minority of the quorum shall be from groups holding line responsibility for the operation of the plant.

5. Responsibilities - The following subjects should be reported to or reviewed by the SAC:

a. Written safety evaluations of (1) changes in the facility, (2) changes to procedures, and (3) tests or experiments completed without prior AEC approval under the provisions of 10 CFR 50.59 to verify that such changes, tests or experiments did not involve a change in the Appendix A Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59.

b. Proposed changes to procedures, changes in the facility, and tests and experiments which may involve a change in the Appendix A Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59. Matters of this kind shall be referred to the SAC following their review by the onsite operating organization.

c. Proposed changes in Appendix A Technical Specifications or proposed license amendments relating to nuclear safety.

d. Violations of applicable codes, regulations, orders, Appendix A Technical Specifications, and license requirements or internal procedures or instructions having nuclear safety significance.

e. Significant operating abnormalities or deviations from normal and expected performance of plant safety-related structures, systems, or components.

f. Investigation of Abnormal Occurrences as defined in the Appendix A Technical Specifications.

g. The Facility Emergency Plan and the Facility Security Plan.

h. Operations Committee minutes.

i. Other nuclear safety matters referred to the SAC by the Operations Committee, plant management or company management.

6. Audit - The operation of the nuclear power plant shall be audited formally under the cognizance of the SAC to assure safe facility operation.

a. Audits of selected aspects of plant operation shall be performed with a frequency commensurate with their nuclear safety significance and in a manner to assure that an audit of all nuclear safety-related activities is completed within a period of two years.

b. Periodic review of the audit program should be performed by the SAC to assure its adequacy.

c. Written reports of the audits shall be reviewed by the Vice President - Power Production & System Operation, by the SAC at a scheduled meeting, and by members of management having responsibility in the areas audited.

7. Authority

The SAC shall be advisory to the Vice President - Power Production & System Operation.

8. Records

Minutes shall be prepared and retained for all scheduled meetings of the Safety Audit Committee. The minutes shall be distributed to the Vice President - Power Production & System Operation, the General Superintendent of Nuclear Power Plant Operation, each member of the SAC and others designated by the Chairman or Vice Chairman within one month of the meeting. There shall be a formal approval of the minutes.

9. Procedures

A written charter for the SAC shall be prepared that contains:

a. Subjects within the purview of the group.

b. Responsibility and authority of the group.

c. Mechanisms for convening meetings.

d. Provisions for use of specialists or subgroups.

e. Authority to obtain access to the nuclear power plant operating record files and operating personnel when assigned audit functions.

f. Requirements for distribution of reports and minutes prepared by the group to others in the NSP organization.

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL
(TEMPORARY FORM)

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FILE:

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TO: Mr Giambusso	ORIG 3 signed	CC	OTHER	SENT AEC PDR XX SENT LOCAL PDR XX		
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DESCRIPTION:

Ltr notarized 4-1-75....trans the following:

ENCLOSURES:

Amdt to OL/Change to Tech Specs: Consisting of revision to the limiting conditions for Operation & surveillance requirements for the standby gas treatment system.....

(40 cys encl rec'd)

PLANT NAME: Monticello

FOR ACTION/INFORMATION 4-1-75 ebf

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