



Northern States Power Company

414 Nicollet Mall  
Minneapolis, Minnesota 55401  
Telephone (612) 330-5500

April 5, 1983

Director  
Office of Nuclear Reactor Regulation  
U S Nuclear Regulatory Commission  
Washington, DC 20555

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

Request for Relief from the Requirements of 10 CFR 50,  
Section 50.48(b) for Fire Zone 9 - Control Room

- Reference (a) Letter from D M Musolf (NSP) to NRR, "Fire Protection and Safe Shutdown Analysis for Meeting the Requirements of Appendix R," dated June 30, 1982.
- (b) Letter from D M Musolf (NSP) to NRR, "Clarification of Information Provided in Support of Request for Relief from Requirements of 10 CFR Part 50, Appendix R, Section III.G," dated October 28, 1982.
- (c) Letter from D M Musolf (NSP) to NRR "Disposition of Unresolved Appendix R Exemption Requests," dated March 22, 1983.

The purpose of this letter is to request in accordance with the provision of 10 CFR Part 50, Section 50.12, an exemption from the requirements of 10 CFR Part 50, Section 50.48, paragraph (b). Specifically, Northern States Power Company requests relief from the requirements to install a fixed suppression system in the Control Room (Fire Zone 9) as required by Appendix R, Section III.G.3.b, for zones provided with alternate shutdown capability.

Previously, we had requested an exemption from the requirements of Section III.G.2. of Appendix R for the Control Room as stated in reference (a) and further substantiated in reference (b). In a working level meeting March 8, 1983 with NRC Staff to discuss proposed modifications in support of this request, NSP learned of the stringent criteria established by the Staff for an exemption from III.G.2 for the Control Room. For reasons of practical feasibility and fire safety, we now plan to satisfy the requirements of III.G.3 in this zone. Subsequently NSP will provide alternate shutdown capability as described in reference (c).

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## NORTHERN STATES POWER COMPANY

Dir of NRR  
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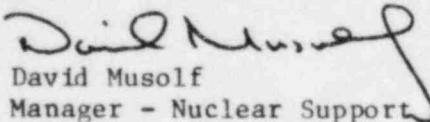
The installation of the fixed suppression system in the Control Room required by Section III.G.3 would have an adverse impact on equipment and personnel by an inadvertent initiation. In support of an exemption from installing a fixed suppression system the following information is provided:

1. The control room is continuously manned in accordance with the plant technical specifications.
2. There is only a light combustible loading in the room.
3. Transient combustible loadings are controlled by administrative procedures.
4. Portable carbon dioxide and halon fire extinguishers are located in the control room and a manual hose station is immediately available outside the entrance.
5. Isolation dampers are provided in the ventilation ducts to maintain habitability.
6. Self-contained breathing units are located in the room.
7. The design of the control panels is such that metal barriers are installed between the required safe shutdown system functions in the control room.
8. Ten ionization detectors exist to provide early detection of possible fires.

Because the Control Room is continuously manned and has the above described fire protection features, there is reasonable assurance that a fire would be promptly extinguished. Therefore, an exemption from the requirements of this part of the regulations will not endanger life or property or the common defense and security and is otherwise in the public interest.

Additionally, proposed modifications previously described in support of an exemption from III.G.2 for the Control Room will not be implemented since they are no longer necessary.

Please contact us if you have any questions related to this request, or if we can furnish additional information related to this issue.

  
David Musolf  
Manager - Nuclear Support Services

DMM/KNC/js

cc: Secretary of the Commission (orig + 2 copies)  
Regional Admin-III, NRC  
NRR Project Manager, NRC  
Resident Inspector, NRC  
G Charnoff

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED APRIL 5, 1983  
REQUEST FOR RELIEF FROM THE REQUIREMENTS  
OF 10 CFR PART 50, SECTION 50.48(b)  
FOR FIRE ZONE 9 - CONTROL ROOM

Northern States Power Company, a Minnesota corporation, by this letter dated April 5, 1982 hereby submits a request for relief from the requirements of 10 CFR 50, Sections 50.48 (b); specifically, Appendix R, Section III.G.3.b.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By /s/ David Musolf  
David Musolf  
Manager - Nuclear Support Services

On this 5th day of April, 1983, before me a notary public in and for said County, personally appeared David Musolf, Manager - Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on 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.

/s/ Betty J. Dean  
Betty J. Dean  
Notary Public - Minnesota  
Ramsey County  
My Commission Expires Dec. 16, 1987