



Northern States Power Company

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November 15, 1994

NRC Gen Ltr 89-19

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

Supplemental Information Concerning Generic Letter 89-19 and USI A-47, "Safety Implications of Control Systems in LWR Nuclear Power Plants" (TAC No. M74965)

- References:
- (1) Generic Letter 89-19 dated September 20, 1989 - Request for Action Related to Resolution of Unresolved Safety Issue A-47 "Safety Implications of Control Systems in LWR Nuclear Power Plants"
 - (2) NSP to NRC Letter dated May 4, 1990 - Response to Generic Letter 89-19, Safety Implications of Control Systems in LWR Nuclear Power Plants
 - (3) NSP License Amendment Request dated October 21, 1991 - Reactor Feedwater Pump Trip Instrumentation
 - (4) NSP to NRC Letter dated September 21, 1992 - Withdrawal of Previously Submitted License Amendment Request Concerning Reactor Feedwater Pump Trip Instrumentation.
 - (5) NRC to NSP Letter dated October 21, 1992 - Monticello - Withdrawal of an Amendment Request (TAC No. M74965)

The purpose of this letter is to provide additional information to the NRC staff concerning Generic Letter 89-19 (Reference 1). Generic Letter 89-19 addressed concerns over the adequacy of reactor vessel overfill protection instrumentation in light water reactors. For BWRs, the instrumentation of concern would cause a trip of the reactor feedwater pumps on vessel high water level conditions. Generic Letter 89-19 also described the NRC Staff recommendations relative to the design, testing, and controls (including Technical Specifications) that should be applied to the reactor overfill instrumentation.

Reference (2) provided NSP's response to GL 89-19. In that response, NSP reported that the Monticello reactor feedwater pump trip instrumentation satisfied GL 89-19 except that the

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instrumentation was not included in the plant Technical Specifications. NSP agreed to revise the Monticello Technical Specifications to include the changes recommended by Generic Letter 89-19 and submitted a license amendment request (Reference (3)) to accomplish this. The NRC Staff subsequently contacted NSP and stated that, based on further review, the Staff no longer considered it necessary for the reactor feedwater pump overflow trip instrumentation to be included in the Monticello Technical Specifications. As a result of this discussion, NSP withdrew the associated license amendment request via Reference (4). The NRC Staff acknowledged this withdrawal and reaffirmed the NRC's position concerning Monticello in Reference (5).

In order to facilitate final closeout of this issue for Monticello, the NRC Staff (Beth Wetzel) recently requested that NSP provide confirmation that the reactor feedwater pump overflow trip instrumentation is not credited as the primary instrument protecting the fuel for any design basis accident or abnormal operational transient analysis described in the Monticello Updated Safety Analysis Report (USAR).

We have reviewed the Monticello USAR and confirmed that the reactor feedwater pump overflow trip instrumentation is not credited as the primary instrument protecting the fuel for any design basis accident or abnormal operational transient analysis described therein. Although the reactor feedwater pump high water level trip is discussed in USAR Section 14.4 ("Feedwater Controller Failure - Maximum Demand" transient analysis), it is clarified elsewhere in the USAR (Section 11.8.2.3) and in supporting documentation that the purpose of the trip is to preclude the possibility of damage to the steam lines, turbine and related equipment due to water impingement and that the trip is not necessary for fuel protection.

This letter contains no new NRC commitments.

Please contact Terry Coss, Sr. Licensing Engineer, at (612) 295-1449 if you require any additional information concerning this submittal.

William J. Silberg for ROA

Roger O. Anderson

Director

Licensing and Management Issues

cc: Regional Administrator-III, NRC
NRR Project Manager, NRC
Resident Inspector, NRC
State of Minnesota,
Attn: Kris Sanda
J. Silberg

TRANSMITTAL MANIFEST
NORTHERN STATES POWER COMPANY
NUCLEAR LICENSING DEPARTMENT
MONTICELLO NUCLEAR GENERATING PLANT

Supplemental information concerning generic letter 89-19 and USI A-47, "Safety implications of control systems in LWR nuclear power plants" (TAC No. M74965)

Manifest Date: November 16, 1994

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Kaleen Hilsinhoff..... USAR File.....	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Steve Ludders NRC Commitment	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Lila Imholt..... Monti OC Sec	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> - 10, No dist to OC members above
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NRC Correspondence Manifest Instructions

Document: Supplemental Information Re: GL 89-19 (USI A-47)

Manifest: M-O

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Special Manifest Requirments

USAR	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	(Send copy to Kaleen Hilsenhoff)
NRC Commitment	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	(Send copy to Steve Ludders)
Resp Reminder	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	

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