



2807 West County Road 75
Monticello, MN 55089

July 20, 2020

L-MT-20-024
10 CFR 50.55a

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket No. 50-263
Renewed Facility Operating License No. DPR-22

Response to Request for Additional Information (RAI) Monticello 10 CFR 50.55a Request:
Request RR-016 Associated with the Fifth Ten-Year Inservice Inspection (ISI) Interval (EPID:
L-2020-LLR-0022)

- References:
1. Letter L-MT-20-004, from NSPM to US NRC, "10 CFR 50.55a Request: Request RR-016 Associated with the Fifth Ten-Year Inservice Inspection (ISI) Interval" (EPID No. L-2020-LLR-0022) (ADAMS Accession No. ML2004E769)
 2. Email from NRC to NSPM, "DRAFT Request for Additional Information RE: Monticello alternative request RR-016 related to H8, H9, and H10 weld examinations", dated July 01, 2020

In Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), submitted the proposal to revise the previously authorized alternative in RR-008 for the H8 and H9 welds (Reference 1) to remove the 2021 refueling outage from the scope of the authorized alternative and to apply a similar alternative to the H10 welds of the core support structure, for NRC review and approval. In Reference 2, the NRC requested additional information. The enclosure to this letter is the NSPM response to the RAI question.

Please contact Mr. Ron Jacobson at (612) 330-6542 or ronald.g.jacobson@xcelenergy.com if there are any questions or if additional information is needed.

Summary of Commitments

This letter makes no new commitments and no revisions to existing commitments.

A handwritten signature in black ink, appearing to read "JA Conboy", with a long horizontal flourish extending to the right.

Thomas A. Conboy
Site Vice President, Monticello Nuclear Generating Plant
Northern States Power Company – Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC

**Response to Request for Additional Information:
Monticello Nuclear Generating Plant (MNGP)
10 CFR 50.55a Request RR-016**

1.0 BACKGROUND

In Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter “NSPM”), submitted the proposal to revise the previously authorized alternative in RR-008 for the H8 and H9 welds to remove the 2021 refueling outage from the scope of the authorized alternative and to apply a similar alternative to the H10 welds of the core support structure, for NRC review and approval. In Reference 2, the NRC requested additional information.

2.0 RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION

NRC Question:

By letter dated February 14, 2020 (ADAMS Accession No. ML20045E769), Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (NSPM, the licensee), submitted a proposed alternative to the inservice inspection (ISI) requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for the H8, H9, and H10 welds of the core support structure at the Monticello Nuclear Generating Plant (MNGP). These welds are ASME Code, Section XI Examination Category B-N-2, “Welded Core Support Structures and Interior Attachments to Reactor Vessels.”

Specifically, pursuant to Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Paragraph 50.55a(z)(2), in lieu of performing the required ASME Code successive examinations in ASME Code, Section XI, IWB-2420(b) and (c) for the H8, H9, and H10 welds, alternative request RR-016 proposes to revise the previously authorized alternative in RR-008 (ADAMS Accession No. ML15013A036) for the H8 and H9 welds to remove the 2021 refueling outage from the scope of the authorized alternative. RR-008 also applied a similar alternative to the H10 welds of the core support structure. The alternative requested to use the proposed alternative on the basis that complying with the requirements would result in hardship or unusual difficulty without a compensating increase in quality or safety.

Section 5 “Proposed Alternative and Basis for Use” of RR-016 (enclosure to the submittal) claims credit for hydrogen water chemistry (HWC) mitigation against crack growth through implementation of Online Noble Metal Chemistry (ONLC). The industry group, Boiling Water Reactor Vessel and Internals Project (BWRVIP), has issued an interim guidance for BWR units that use and credit all forms of HWC by letter dated January 24, 2018 (ADAMS Accession No. ML18033A323). By letter dated July 6, 2018 (ADAMS Accession No. ML18142A019), the NRC staff evaluated this interim guidance as a supplemental safety evaluation of proprietary topical report BWRVIP-62-A (ADAMS Accession No. ML19178A131 PROPRIETARY). The interim guidance states in part that BWR units that use and credit all forms of HWC “shall meet

the conditions and limitations of BWRVIP-62-A. In the case of plants utilizing ONLC, this means they shall meet the Category 3a NMCA [noble metal chemistry addition] parameters and implementation steps (including platinum loading) of Tables 3-5 and 3-8 [of BWRVIP-62-A].”

The alternative requested stated that water chemistry controls will be implemented per the guidelines in BWRVIP-190 “BWR Water Chemistry Guidelines” and BWRVIP 2019-025 “2019 BWR Water Chemistry Guidelines Interim Guidance,” but the staff is not clear if BWRVIP-190 and/or BWRVIP 2019-025 have incorporated the interim guidance in the January 24, 2018 letter.

Request

Confirm that MNGP meets the Category 3a NMCA parameters and implementation steps (including platinum loading) of Tables 3-5 and 3-8 of BWRVIP-62-A per the January 24, 2018, interim guidance.

NSPM Response:

MNGP meets the Category 3a NMCA parameters and implementation steps (including platinum loading) of Tables 3-5 and 3-8 of BWRVIP-62-A per the January 24, 2018, interim guidance.

3.0 REFERENCES

1. Letter L-MT-20-004, from NSPM to US NRC, “10 CFR 50.55a Request: Request RR-016 Associated with the Fifth Ten-Year Inservice Inspection (ISI) Interval” (EPID NO. L-2020-LLR-0022) (ADAMS Accession No. ML2004E769)
2. Email from NRC to NSPM, “DRAFT Request for Additional Information RE: Monticello alternative request RR-016 related to H8, H9, and H10 weld examinations”, dated July 01, 2020