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**Monticello 10 CFR 50.55a(z)(2) Request  
to Defer PVT of MO-2397**

**07.14.2023**

## Agenda

- Purpose
- Applicable IST Requirements
- Proposed Alternative
- Schedule

## Purpose

Discuss proposed 50.55a(z)(2) alternative to the American Society of Mechanical Engineers (ASME) 2017 OM Code for the periodic verification testing (PVT) of the Monticello Nuclear Generating Plant (MNGP) motor-operated MO-2397 (Reactor Water Clean-Up Inboard Isolation Valve).

## Applicable IST Program Requirements

- Code of Record: ASME OM Code, 2017 Edition
  - Mandatory Appendix III-3300
  - Mandatory Appendix III-3310
  - Mandatory Appendix III-3722

## Proposed (z)(2) Alternative

- To test at a frequency of twelve years, until the MNGP spring 2025 refueling outage.
- The valve would return to the test frequency of 2017 OM Code Mandatory Appendix III following the 2025 refueling outage.

This request would allow the testing of MO-2397 during the next refueling outage instead of a forced outage, avoiding a hardship without a compensating increase in the level of quality and safety.

## Reason

- During the 2023 MNGP refueling outage, maintenance was performed without first conducting the as-found PVT.
- PVT had been required to satisfy the 10-year frequency requirement.
  - Last As-Found PVT conducted in 2013; functional margin less than 10%
  - Actuator replacement in 2017 with as-left functional margin greater than 10%
- MO-2397 is a Low Safety Significance Component (LSSC) located in the Drywell, which is a Locked High Radiation Area. Forced outage testing would require significant dose accumulation and increase industrial safety risk.

## Schedule

- Submittal date – 7/24/2023
- NRC approval – 10/8/2023

