

January 21, 2000

Mr. Roger O. Anderson, Director  
Nuclear Energy Engineering  
Northern States Power Company  
414 Nicollet Mall  
Minneapolis, MN 55401

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT RE: COMPLETION OF  
LICENSING ACTION FOR GENERIC LETTER 99-02, "LABORATORY TESTING  
OF NUCLEAR-GRADE ACTIVATED CHARCOAL" (TAC NO. MA5814)

Dear Mr. Anderson:

On June 3, 1999, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," to all holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

The purpose of the GL was to:

- (1) Alert addressees that the NRC has determined that testing nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with the current licensing basis as it relates to the dose limits of General Design Criterion (GDC) 19 of Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR) and Subpart A of 10 CFR Part 100.
- (2) Request that all addressees determine whether their Technical Specifications (TS) reference ASTM D3803-1989 for charcoal filter laboratory testing. Addressees whose TS do not reference ASTM D3803-1989 should either amend their TS to reference ASTM D3803-1989 or propose an alternative test protocol and provide the information discussed in the requested actions.
- (3) Alert addressees to the staff's intent to exercise enforcement discretion under certain conditions.
- (4) Request that all addressees send the NRC written responses to this generic letter relating to implementation of the requested actions.

In GL 99-02, the NRC staff established the following four groups of plants:

- (1) plants in compliance with their TS that test in accordance with ASTM D3803-1989
- (2) plants in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989

- (3) plants not in compliance with their TS that test in accordance with ASTM D3803-1989
- (4) plants not in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989

In response to GL 99-02, you provided a letter dated November 30, 1999 for Monticello. This submittal indicated that yours is a Group 1 plant; however, you propose to submit some minor TS changes to formally invoke the GL 99-02 guidance. The standby gas treatment system charcoal filters are currently tested in accordance with the test protocol of ASTM D3803-1989 with sample removal per NRC Regulatory Guide (RG) 1.52. However, the test standard requirements are referenced in the TS Bases section rather than in the body of the TS and the acceptance criteria implies a safety factor of 1.7, even though test results show the samples meet an acceptance criteria using a safety factor of 2. The control room emergency filtration (EFT) system charcoal filters are currently tested in accordance with the test protocol of ASTM D3803-1989 and RG 1.52; however, the sample removal requirements of RG 1.52 are not specifically referenced. You have adequate administrative controls (engineering work instructions, surveillance procedures and procurement documentation) in place to ensure that the charcoal filters will continue to be tested in accordance with the test protocol of ASTM D3803-1989 while processing the minor TS changes to formally invoke the GL 99-02 test protocol guidance. In your letter dated November 30, 1999, you made the following commitment:

Proposed changes to the Monticello Technical Specifications to conform with the guidance of NRC Generic Letter 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," will be submitted by March 1, 2000, along with the changes to conform EFT System testing to ASME [American Society of Mechanical Engineers] N510-1989.

The staff has reviewed your response and has concluded that all requested information has been provided; therefore, we consider GL 99-02 to be closed for your facility. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at (301) 415-2296.

Sincerely,

*/RA/*

Carl F. Lyon, Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-263

cc: See next page

- (3) plants not in compliance with their TS that test in accordance with ASTM D3803-1989
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 Project Directorate III  
 Division of Licensing Project Management  
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Monticello Nuclear Generating Plant

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