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October 6, 1988

Generic Letter 87-02

Director of Nuclear Reactor Regulation  
U S Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

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

Response to Generic SER on SQUG Resolution  
of Unresolved Safety Issue A-46

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the Seismic Qualification Utility Group (SQUG). The cover letter to the NRC SER requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. This letter, provided in response to that request, describes our plant specific seismic verification plans consistent with the requirements of Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46".

As members of SQUG and the Electric Power Research Institute (EPRI), we have supported the many efforts on which the GIP is based. The NRC SER endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments in accordance with the SQUG schedule presented at the August 10-11, 1988 meeting with the NRC Staff and included in Reference 1. This schedule projects completion of Revision 2 of the GIP in the Spring of 1989, contingent upon SQUG and NRC agreement on the resolution of various open issues. Revision 2 of the GIP is the version which is scheduled to contain all of the information needed to implement the USI A-46 generic letter at SQUG member plants. The final NRC SER supplement on Revision 2 of the GIP is anticipated by mid-1989 and SQUG sponsored training of walkdown

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team members is expected to begin after its receipt in the fall of 1989.

Our plans for implementation of the GIP are necessarily preliminary given the current status of and schedule for completion of Revision 2 of the GIP, the NRC's SER supplement on that revision, and the completion of training of team members. However, it is our current plan to resolve USI A-46 for Monticello by implementation of the generic criteria and methodology included in Revision 0 of the GIP, as clarified by the SQUG responses to the NRC SER in Reference 2. We plan to complete the seismic verification plant walkdowns required by the GIP, within 60 days following the conclusion of the second refueling outage after the receipt of the final SER supplement and resolution of all open issues and the completion of team training. This schedule assumes no major changes in the work scope or cost currently envisioned from Revision 0 of the GIP, including the criteria to be added for cable raceways, tanks, heat exchangers, and relays.

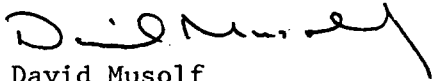
If the final NRC SER supplement with no open items is issued by the second quarter of 1989, and walkdown team training can be completed by the beginning of 1990, then the plant walkdowns at Monticello are expected to be completed by about the third quarter of 1993. The selection of team members for the resolution of USI A-46 is in progress, and we expect to begin the identification of safe shutdown equipment in the near future.

Our current implementation plan and schedule, as described above, are based on the "SQUG Commitments" identified in each section of the GIP. We also desire to integrate the resolution of USI A-46 with the resolution of numerous other related seismic issues (e.g. Eastern Seismicity, Seismic Margins, and Severe Accident Individual Plant External Event Evaluations). In view of the uncertainties in the requirements and schedule for resolution of these related issues, we may revise our implementation schedule for USI A-46 to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions with the NRC Staff, and further discussions are planned. We will advise you in writing of any changes in our implementation plans or schedules.

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Please contact us if you have any questions related to the information provided.



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c: Regional Administrator-III, NRC  
NRR Project Manager, NRC  
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References:

- 1) Letter dated August 19, 1988 from SQUG to L C Shao, Director of NRC  
Division of Engineering and Systems Technology
- 2) Letter dated September 23, 1988 from SQUG to L C Shao, Director of NRC  
Division of Engineering and Systems Technology