



Fuel Transition License Amendment Request Pre-Application Meeting



Monticello Nuclear Generating Plant February 28, 2013



Meeting Objectives

- Present Xcel Energy's plans for a <u>Simplified</u> <u>Fuel Transition</u> review and approval in time to meet fuel delivery commitments
- 2. Obtain NRC feedback



Importance of Fuel Transition

- Xcel Energy is committed to AREVA Fuel Transition
 - Significant cost savings to ratepayers
 - Fewer spent fuel assemblies
- Need fuel transition amendment approved prior to reload for Cycle 28 (January 2015)



Background

- Fuel Transition to AREVA ATRIUM 10XM fuel
 - Fuel design approved per AREVA topical reports
 - ATRIUM 10XM operating at EPU conditions in another licensee's core
- Original Approach for AREVA Fuel Transition LAR
 - Add analysis methodology changes to TS
 - License a representative core design for MNGP Cycle 28
 - Illustrate the applicability, identify new TS values
 - Analysis would bound the EPU/MELLLA+ power-flow map (include AREVA EFW analysis)
 - Not an additional power uprate



Background

- Pre-Application meeting July 2012
 - Discussed need for approval in early 2015
 - Xcel Energy Planned to submit Fuel Transition LAR after EPU/MELLLA+ approval because of potential linkage questions
 - NRC: "difficult and challenging" for EFW review



Revised Licensing Plan

Plan

- Split the Fuel Transition into 2 phases
 - Phase I Submit AREVA Simplified Fuel Transition in July 2013 prior to completion of EPU review
 - Phase II Determine best option(s) to achieve full EPU power using AREVA fuel

Objectives

- NRC approval of AREVA Fuel Transition prior to Cycle 28 refueling outage (January 2015)
- Avoid "linked" amendments

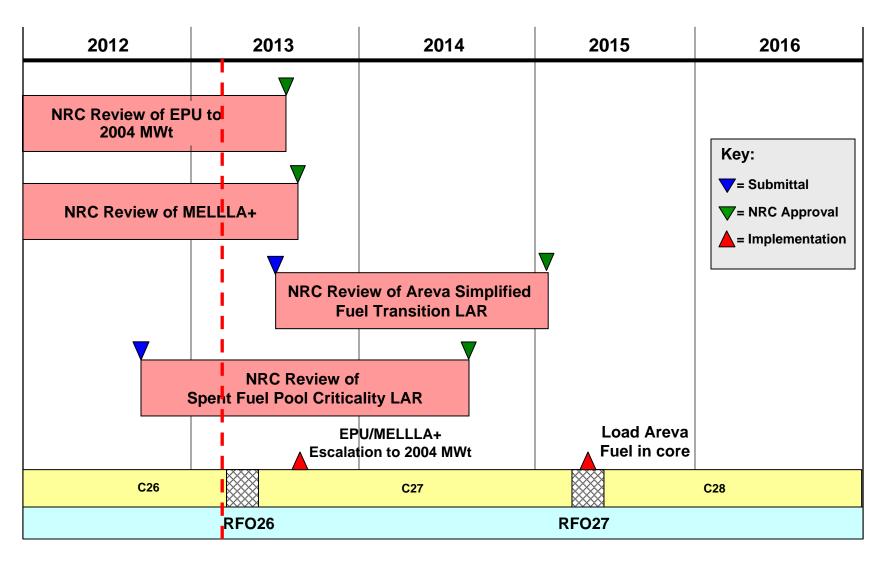


Revised Licensing Plan – Phase I

- Phase I LAR for Simplified AREVA Fuel Transition
 - Similar submittal to NRC previously approved fuel transition
 - Perform analyses at EPU/MELLLA conditions
 - "difficult and challenging" portion of NRC review (EFW) would be eliminated
 - Submit no later than July 2013
 - NRC complete approval at EPU/MELLLA conditions by January 2015 to support 2015 refueling outage



Revised Licensing Plan - Phase I





Revised Licensing Plan – Phase 2

- Determine best option(s) to achieve full EPU power using AREVA fuel
- Current options being explored:
 - Submit LAR to implement AREVA Extended Flow Window
 - Submit LAR to implement MELLLA+ for AREVA fuel
 - Install upgraded Jet Pumps to use up to 105% of the flow window (already licensed)



Questions for Simplified Fuel Transition

- Assuming Simplified Fuel Transition is submitted for MNGP EPU power level without an EFW, requires disposition of the following questions:
 - Does this constitute a linked amendment with EPU/MELLLA+?
 - What happens to MELLLA+ approval when Simplified Fuel Transition is approved?
 - What happens to accessibility to all regions of power-flow map at EPU without MELLLA+?
 - Is ATWSi analysis needed?



Simplified Fuel Transition Not Linked to EPU/MELLLA+

- EPU/MELLLA+ approval schedules will overlap with submittal of Simplified Fuel Transition
- Simplified Fuel Transition analyses performed at EPU MELLLA (not MELLLA+) conditions
- Licensing approach:
 - 1. AREVA analyses used to bound plant operation conditions
 - 2. CAP and Steam Dryer analyses for EPU not affected by Simplified Fuel Transition
 - 3. EPU review nearly complete when Simplified Fuel Transition submitted
- Not linked to EPU/MELLLA+



Simplified Fuel Transition without GE MELLLA+

- MELLLA+ topically approved for GE14 fuel type only
 - For MNGP this would be a TS defined methodology
- MELLLA+ methods are included in MNGP COLR
- Licensing approach:
 - MELLLA+ amendment applies to GE14 fuel only
 - Simplified Fuel Transition LAR will remove MELLLA+ TS (e.g. Thermal Power – High Scram line)
 - Cycle 28 COLR (transition core) will remove MELLLA+ methods
- Removal of MELLLA+ addressed in Simplified Fuel Transition LAR

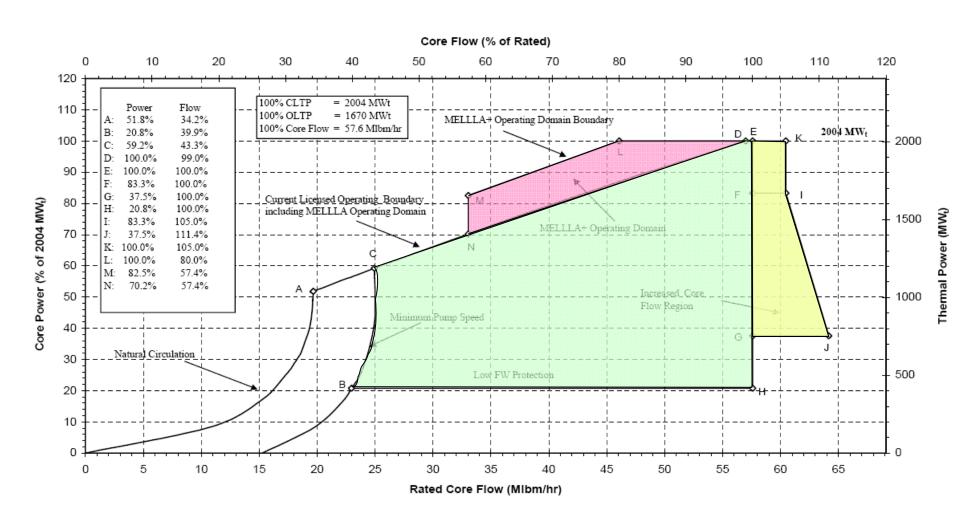


Simplified Fuel Transition Operation Within Power-Flow Map

- Operation will be within the EPU/MELLLA Power-Flow Map
 - Operation will be conducted with an adequate flow window
- Licensing approach:
 - Analyses will conservatively cover the entire EPU/MELLLA Power-Flow Map
 - MELLLA operating domain
 - Increased Core Flow region
 - Off-rated conditions
- EPU/MELLLA Power-Flow Map analyzed in Simplified Fuel Transition LAR



Power-Flow Map (EPU-M+)





Simplified Fuel Transition Analysis for ATWS Instability

- Operation within the MELLLA domain will be addressed by a detailed disposition
 - Generically addressed by the BWROG for MELLLA in NEDO-32047 and NEDO-32164
 - No change in maximum rod line under EPU/MELLLA
 - Consistent with previously approved fuel transition at EPU conditions
- Licensing approach:
 - 1. AREVA analysis described above
 - 2. Analysis ATWSi for EFW is deferred
- ATWSi for EPU/MELLLA analyzed in Simplified Fuel Transition LAR



Summary

- Simplified Fuel Transition LAR will be submitted no later than July 2013 with requested approval no later than January 2015
 - Removes AREVA EFW from the Fuel Transition
 - Follows precedent from previous fuel transition (including ATWSi analysis)
 - Not a linked amendment with EPU/MELLLA+
 - MELLLA+ approval will be removed from TS and COLR
 - Power-flow map at EPU conditions is attainable without MELLLA+



Acronym List

- ABSP Automatic Backup Stability Protection
- ACRS Advisory Committee on Reactor Safeguards
- ATWS Anticipated Transient Without Scram
- ATWS ATWS with instability
- BSP Backup Stability Protection
- BWR Boiling Water Reactor
- BWROG Boiling Water Reactor Owners Group
- CAP Containment Accident Pressure
- COLR Core Operating Limits Report
- CPR Critical Power Ratio
- CSA Criticality Safety Analysis
- DSS-CD Detect and Suppress Solution -Confirmation Density
- ECCS Emergency Core Cooling System
- EFW Extended Flow Window
- EO-III Enhanced Option III
- EPU Extended Power Uprate

- GEH General Electric Hitachi
- GNF Global Nuclear Fuels
- LAR License Amendment Request
- LHGR Linear Heat Generation Rate
- LOCA Loss of Coolant Accident
- LTR Licensing Topical Report
- MAPLHGR Maximum Average Planar Linear Heat Generation Rate
- MELLLA Maximum Extended Load Line Limit Analysis
- MELLLA+ Maximum Extended Load Line Limit Analysis Plus
- MNGP Monticello Nuclear Generating Plant
- MWt Megawatts Thermal
- NRC Nuclear Regulatory Commission
- OPRM Oscillation Power Range Monitor
- SPT Stability Protection Trip
- TCD Thermal Conductivity Degradation
- TS Technical Specifications