



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 8, 2020

Mr. Thomas A. Conboy
Site Vice President
Northern States Power Company - Minnesota
Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362

Mr. Scott Sharp
Site Vice President
Prairie Island Nuclear Generating Plant
Northern States Power Company - Minnesota
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT AND PRAIRIE ISLAND
NUCLEAR GENERATING PLANT, UNITS 1 AND 2 – ISSUANCE OF
AMENDMENT NOS. 204, 231, AND 219 RE: TSTF-529, “CLARIFY USE AND
APPLICATION RULES” (EPID L-2020-LLA-0035)

Dear Mr. Conboy and Mr. Sharp:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 204 to Renewed Facility Operating License No. DPR-22, Amendment No. 231 to Renewed Facility Operating License No. DPR-42, and Amendment No. 219 to Renewed Facility Operating License No. DPR-60 for the Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant, Units 1 and 2, respectively. The amendments consist of changes to the technical specifications (TSs) in response to your application dated February 27, 2020.

The amendments revise the TS requirements in Sections 1.3 and 3.0 regarding Limiting Condition for Operation and Surveillance Requirement usage consistent with Technical Specifications Task Force (TSTF) Traveler TSTF-529, “Clarify Use and Application Rules” Revision 4.

A copy of the NRC staff's safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Robert F. Kuntz, Senior Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-263, 50-282, and 50-306

Enclosures:

1. Amendment No. 204 to DPR-22
2. Amendment No. 231 to DPR-42
3. Amendment No. 219 to DPR-60
4. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NORTHERN STATES POWER COMPANY - MINNESOTA

DOCKET NO. 50-263

MONTICELLO NUCLEAR GENERATING PLANT

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 204
Renewed License No. DPR-22

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northern States Power Company – Minnesota dated February 27, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission’s rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission’s regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission’s regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-22 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendix A, as revised through Amendment No. 204, are hereby incorporated in the license. NSPM shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Nancy L. Salgado, Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License and Technical
Specifications

Date of Issuance: September 8, 2020

ATTACHMENT TO LICENSE AMENDMENT NO. 204
MONTICELLO NUCLEAR GENERATING PLANT
AMENDMENT TO RENEWED FACILITY OPERATING LICENSE
DOCKET NO. 50-263

Renewed Facility Operating License No. DPR-22

Replace the following page of the Renewed Facility Operating License No. DPR-22 with the attached revised page. The revised page is identified by amendment number and contain marginal lines indicating area of change

INSERT

REMOVE

Page 3

Page 3

Technical Specifications

Replace the following pages of Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

INSERT

REMOVE

1.3-1

1.3-1

1.3-2

1.3-2

1.3-3

1.3-3

3.0-1

3.0-1

3.0-4

3.0-4

2. Pursuant to the Act and 10 CFR Part 70, NSPM to receive, possess, and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operations, as described in the Final Safety Analysis Report, as supplemented and amended, and the licensee's filings dated August 16, 1974 (those portions dealing with handling of reactor fuel);
 3. Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NSPM to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 4. Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NSPM to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
 5. Pursuant to the Act and 10 CFR Parts 30 and 70, NSPM to possess, but not separate, such byproduct and special nuclear material as may be produced by operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission, now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
1. Maximum Power Level

NSPM is authorized to operate the facility at steady state reactor core power levels not in excess of 2004 megawatts (thermal).
 2. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 204, are hereby incorporated in the license. NSPM shall operate the facility in accordance with the Technical Specifications.
 3. Physical Protection

NSPM shall implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
DESCRIPTION	<p>The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.</p> <p>Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.</p> <p>Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.</p> <p>If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the</p>

1.3 Completion Times

DESCRIPTION (continued)

discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent division, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each division, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ."

1.3 Completion Times

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 12 hours AND in MODE 4 within 36 hours. A total of 12 hours is allowed for reaching MODE 3 and a total of 36 hours (not 48 hours) is allowed for reaching MODE 4 from the time that Condition B was entered. If MODE 3 is reached within 6 hours, the time allowed for reaching MODE 4 is the next 30 hours because the total time allowed for reaching MODE 4 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 4 is the next 36 hours.

3.0 LIMITING CONDITION FOR OPERATION (LCO) Applicability

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 2 within 7 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
 - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
 - c. When an allowance is stated in the individual value, parameter, or other Specification.
-

3.0 SURVEILLANCE REQUIREMENT (SR) Applicability

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.



UNITED STATES
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WASHINGTON, D.C. 20555-0001

NORTHERN STATES POWER COMPANY - MINNESOTA

DOCKET NO. 50-282

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 231
Renewed License No. DPR-42

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northern States Power Company, a Minnesota Corporation (NSPM, the licensee), dated February 27, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-42 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 231, are hereby incorporated in the renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Nancy L. Salgado, Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License and Technical
Specifications

Date of Issuance: September 8, 2020



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NORTHERN STATES POWER COMPANY - MINNESOTA

DOCKET NO. 50-306

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 219
Renewed License No. DPR-60

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northern States Power Company, a Minnesota Corporation (NSPM, the licensee), dated February 27, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-60 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendix A, as revised through Amendment No. 219, are hereby incorporated in the renewed operating license. NSPM shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Nancy L. Salgado, Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License and Technical
Specifications

Date of Issuance: September 8, 2020

ATTACHMENT TO LICENSE AMENDMENT NOS. 231 AND 219

RENEWED FACILITY OPERATING LICENSE NOS. DPR-42 AND DPR-60

DOCKET NOS. 50-282 AND 50-306

Replace the following pages of the Renewed Facility Operating License Nos. DPR-42 and DPR-60 with the attached revised pages. The changed areas are identified by a marginal line.

REMOVE

Page 3

Page 3

INSERT

Page 3

Page 3

Technical Specifications

Replace the following pages of the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

1.3-1

1.3-2

1.3-3

3.0-2

3.0-6

INSERT

1.3-1

1.3-2

1.3-3

3.0-2

3.0-6

- (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NSPM to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 - (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, NSPM to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument and equipment calibration or associated with radioactive apparatus or components;
 - (5) Pursuant to the Act and 10 CFR Parts 30 and 70, NSPM to possess but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility;
 - (6) Pursuant to the Act and 10 CFR Parts 30 and 70, NSPM to transfer byproduct materials from other jobsites owned by NSPM for the purpose of volume reduction and decontamination.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level

NSPM is authorized to operate the facility at steady state reactor core power levels not in excess of 1677 megawatts thermal.
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 231, are hereby incorporated in the renewed operating license. NSPM shall operate the facility in accordance with the Technical Specifications.
 - (3) Physical Protection

NSPM shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains

- (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NSPM to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 - (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, NSPM to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument and equipment calibration or associated with radioactive apparatus or components;
 - (5) Pursuant to the Act and 10 CFR Parts 30 and 70, NSPM to possess but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility;
 - (6) Pursuant to the Act and 10 CFR Parts 30 and 70, NSPM to transfer byproduct materials from other jobsites owned by NSPM for the purposes of volume reduction and decontamination.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level

NSPM is authorized to operate the facility at steady state reactor core power levels not in excess of 1677 megawatts thermal.
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 219, are hereby incorporated in the renewed operating license. NSPM shall operate the facility in accordance with the Technical Specifications.
 - (3) Physical Protection

NSPM shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.

BACKGROUND Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).

DESCRIPTION The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from

1.3 Completion Times

DESCRIPTION (continued) discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. The Completion Time extension cannot be used to extend the stated Completion Time for the first inoperable train, subsystem, component, or variable. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

1.3 Completion Times

DESCRIPTION (continued)	<p>The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:</p> <ol style="list-style-type: none"> a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or b. The stated Completion Time as measured from discovery of the subsequent inoperability.
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The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." An example of a modified "time zero" with the Completion Time expressed as "once per 8 hours" is illustrated in Example 1.3-6, Condition A. In this example, the Completion Time may not be extended.

3.0 LCO APPLICABILITY (continued)

- LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
 - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
 - c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered.

3.0 SR APPLICABILITY (continued)

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 204 TO RENEWED FACILITY OPERATING
LICENSE NO. DPR-22, AMENDMENT NO. 231 TO RENEWED FACILITY
OPERATING LICENSE NO. DPR-42, AND AMENDMENT NO. 219
TO RENEWED FACILITY OPERATING LICENSE NO. DPR-60
NORTHERN STATES POWER COMPANY – MINNESOTA
MONTICELLO NUCLEAR GENERATING PLANT AND
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
DOCKET NOS. 50-263, 50-282, AND 50-306

1.0 INTRODUCTION

By application dated February 27, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20058F943), Northern States Power Company, a Minnesota Corporation (the licensee), requested changes to the technical specifications (TSs) for Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant, Units 1 and 2. The application requests adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-529, Revision 4, "Clarify Use and Application Rules." The proposed changes would revise TS Sections 1.3, "Completion Times," and 3.0, "LCO [limiting condition for operation] Applicability" and "SR [surveillance requirement] Applicability."

By letter dated February 29, 2016 (ADAMS Accession No. ML16062A271), the TSTF submitted TSTF-529, Revision 4. Traveler TSTF-529 proposes changes to NUREG-1430, "Standard Technical Specifications [(STS)] Babcock and Wilcox Plants," NUREG-1431, "Standard Technical Specifications Westinghouse Plants," NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," NUREG-1433, "Standard Technical Specifications General Electric Plants BWR/4," and NUREG-1434, "Standard Technical Specifications General Electric Plants, BWR/6" (ADAMS Accession Nos. ML12100A177, ML12100A222, ML12102A165, ML12104A192 and ML12104A195, respectively).

2.0 REGULATORY EVALUATION

2.1 Description of Subject TS Sections

The LCOs specify minimum requirements for ensuring safe operation of the unit. The actions associated with an LCO state conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated condition are required action(s) and completion time(s).

TS Section 1.3, "Completion Times," currently describes completion times as follows:

The completion time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the time of discovery of the situation that required entry into the Condition.

Once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition.

The LCO 3.0.1 through LCO 3.0.9 establish the general requirements applicable to all specifications and apply at all times, unless otherwise stated. Similarly, SR 3.0.1 through SR 3.0.4 establish the general requirements for surveillances that are applicable to all specifications and apply at all times, unless otherwise stated.

2.2 Description of TS Changes

The proposed change will revise the TS Sections 1.3, "Completion Times," and 3.0, "LCO Applicability" and "SR Applicability," and the TS Bases for Section 3.0, "LCO Applicability" and "SR Applicability." The proposed changes are described in more detail below.

2.2.1 Proposed Changes to “Time of Discovery”

TS Section 1.3, “Description,” currently states, in part, the following (with emphasis added on “time of”):

The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the *time of* discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

TS Section 1.3, “Description,” also currently states, in part, the following (with emphasis added on “time of”):

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the *time of* discovery of the situation that required entry into the Condition.

The proposed TS Section 1.3 would delete “time of” from the previous statements and read as follows:

The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

[...]

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition.

The adequacy of this change is discussed in Section 3.1.1.1.

2.2.2 Proposed Addition to “Time of Discovery”

The amendment request proposed to add a paragraph to Section 1.3 of the TS under Description. The paragraph describes determination of the beginning of “Completion Time” in an LCO.

The adequacy of this change is discussed in Section 3.1.1.2.

2.2.3 Proposed Addition of “Unless Otherwise Specified”

TS Section 1.3, “Description,” currently states the following (with emphasis added on “unless otherwise specified”):

The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

The amendment request proposed to add the following sentence right after the above statement to TS Section 1.3, which contains the phrase “unless otherwise specified:”

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered.

In addition, the amendment request proposed adding the phrase “unless otherwise specified” to the following two statements:

When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

and

The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

The adequacy of this change is discussed in Section 3.1.1.3.

2.2.4 Proposed Changes to LCO 3.0.4

TS LCO 3.0.4 currently states:

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the

results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or

- c. When an allowance is stated in the individual value, parameter, or other Specification.

The amendment request proposed to clarify the b. statement above by placing the statement regarding exceptions in parenthesis and replacing the ending comma with a semicolon. The proposed TS LCO 3.0.4 would state the following:

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

The adequacy of this change is discussed in Section 3.1.2.

2.2.5 Proposed Changes to TS SR 3.0.3

TS SR 3.0.3 currently states the following:

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

The amendment request proposed that TS SR 3.0.3 states the following (the additional sentence is underlined):

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

The adequacy of this change is discussed in Section 3.1.3.

2.3 Regulatory Requirements, Licensing Information, Guidance Documents

Per Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(b), each license authorizing operation of a utilization facility will include TSs. The TS will be derived from the analyses and evaluations included in the safety analysis report, and amendments thereto, submitted pursuant to 10 CFR 50.34 (describing the technical information to be included in applications for an operating license). The U.S. Nuclear Regulatory Commission (NRC or Commission) may include such additional TSs as the Commission finds appropriate.

The NRC staff's guidance for review of the TSs is in Chapter 16, "Technical Specifications," of NUREG-0800, "Standard Review Plan [(SRP)]," Revision 3, dated March 2010 (ADAMS Accession No. ML100351425). As described therein, as part of the regulatory standardization effort, the NRC staff has prepared STS (NUREG-1430 to NUREG-1434) for each of the light-water reactor nuclear steam supply systems and associated balance-of-plant equipment systems. Accordingly, the NRC staff's review includes consideration of whether the proposed TSs are consistent with the applicable reference TS (i.e., the current STS), as modified by NRC-approved TSTF Travelers such as TSTF-529, Revision 4. Special attention is given to TS provisions that depart from the reference TSs and NRC-approved TSTF Travelers to determine whether proposed differences are justified by uniqueness in plant design or other considerations so that 10 CFR 50.36 is met.

3.0 TECHNICAL EVALUATION

During the review of amendment request, the NRC staff considered generally the guidance on acceptance criteria of the SRP sections described in Section 2.3 of this safety evaluation (SE), and, in particular, the acceptance criteria in Chapter 16, "Technical Specifications," of NUREG-0800, Revision 3. Additionally, the NRC staff evaluated the proposed changes to the TS against what is required to be in the TSs under 10 CFR 50.36(c).

3.1 Requested Changes

3.1.1 Proposed Changes to Section 1.3, "Completion Times"

3.1.1.1 Proposed Changes to "Time of Discovery"

The only mention of the term "time of discovery" in relation to completion times is in TS Section 1.3 (quoted in Section 2.2.1 of this SE). Throughout the TS, the term "discovery" is used to describe the point in time that it is recognized that the requirements of an LCO are not met. For example, TS LCO 3.0.2 states in part, "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6." In addition, the Bases to LCO 3.0.2, state, in part, "LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met."

The proposed TS Section 1.3 would delete "time of" from the previous statements. The NRC staff finds the proposed change acceptable because it makes Section 1.3 consistent with the language used throughout the rest of the TS. This provides clarity to the term "discovery," and therefore provides a clear and objective application of the TS-required actions and associated Completion Times. The change is editorial since it does not change the requirements currently in the TSs. Therefore, the NRC staff finds the proposed change acceptable.

3.1.1.2 Proposed Addition to "Time of Discovery"

The amendment request proposed to add the following paragraph to Section 1.3 of the TS under Description:

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with

inoperability of redundant required feature(s).” In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

The operating shift crew is responsible for overall control of facility operation. As part of that responsibility, the operating shift crew must be aware of the status of the plant and condition of structures, systems and components (SSCs). This includes status of degraded or nonconforming conditions that may affect plant operation. Therefore, the proposed change simply augments the NRC staff’s expectation that a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and a Condition is entered. The phrase “and an ACTIONS Condition is entered” in the proposed insertion, is necessary to accommodate circumstances in which LCO 3.0.6 allows an LCO to not be met without entry into the Conditions. In those circumstances, a Completion Time does not begin. In addition, an example is added to the proposed insertion in order to explain the concept presented.

The NRC staff finds the proposed change acceptable because it clarifies senior reactor operators’ responsibilities and the allowances of LCO 3.0.6 and, therefore, provides a clear and objective application of the TS Required Actions and associated Completion Times.

3.1.1.3 Proposed Addition of “Unless Otherwise Specified”

The phrase, “unless otherwise specified,” in TS Section 1.3, refers to those instances in which TSs LCOs define the start of the Completion Time as different from “discovery.” For example, TS, Specification 3.8.1, “AC Sources - Operating,” Required Action B.2, calls for declaring required feature(s) supported by an inoperable diesel generator inoperable when the redundant required feature(s) are inoperable. The Completion Time states, “4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s).” In this case, the Completion Time does not begin until the conditions in the Completion Time are satisfied.

As discussed in Section 2.2.3 of this SE, the amendment request proposed to add the phrase “unless otherwise specified” to TS Section 1.3. The addition of the phrase “unless otherwise specified” acknowledges that there are instances, as indicated in the individual TSs, when the completion time does not start at discovery. These exceptions are varied, such as when a Required Action Note or SRs Note provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While using the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point.

The NRC staff finds the proposed changes acceptable since they clarify that there are exceptions and, therefore, provides a clear and objective application of the TS Required Actions and associated Completion Times.

3.1.2 Proposed Changes to LCO 3.0.4

As stated in Section 2.2.4 of this SE, the current TS LCO 3.0.4 contains three options (a, b, and c). Paragraph a ends with a semicolon and paragraph b ends with “or.”

The LCO 3.0.4.b, "After performance of a risk assessment ... stated in the individual Specifications, or," could lead to operator misinterpretation. Operators could misapply this statement by believing the "or" applies to the phrase regarding exceptions and that LCO 3.0.4.a, b, and c, apply concurrently.

The amendment request is proposing to clarify this sentence by placing the statement regarding exceptions in parenthesis and replacing the ending comma with a semicolon. The proposed TS LCO 3.0.4 would state the following: "After performance of a risk assessment ... if appropriate (exceptions to this specification are stated in the individual specifications); or."

The NRC staff finds that the change is editorial since it does not change the requirements currently in the TSs. The NRC staff finds the proposed change acceptable since it removes potential for misapplication of LCO 3.0.4 allowances and, therefore, provides a clear and objective application of the TS Required Actions.

3.1.3 Proposed Changes to SR 3.0.3

The NRC has typically interpreted SR 3.0.3, which is quoted in Section 2.2.5 of this SE, as inapplicable to SRs that have never been previously performed. This is because the allowance provided by SR 3.0.3 is based on the fact that the SR was satisfactorily met in the past and the most probable result of performing the SR is the verification of conformance with the requirements. Therefore, there is reasonable expectation the SR will be met when performed.

However, the NRC staff recognizes that there are instances in which an SR may not have been performed in the past, but there is still a reasonable expectation the SR will be met when performed. For example, an SR requires testing of a relay contact. A licensee finds the relay contact has never been tested as required in accordance with a particular SR. That licensee, however, finds there is a reasonable expectation the SR will be met when performed because the subject relay contact has been tested by another SR or historical operation of the subject relay contact has been successful.

The delay period allowed by TS SR 3.0.3 offers adequate time to complete SRs that have been missed. In addition, this delay period permits the completion of an SR before complying with required actions or other remedial measures that might preclude completion of the SR. The NRC staff finds the application of the delay period provided by TS SR 3.0.3 acceptable for use on SRs that have never been performed so as long as licensees can provide an adequate determination of reasonable expectation the SR will be met when performed.

The amendment proposed to modify TS SR 3.0.3 to add a sentence to state that "The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed."

When making a determination of reasonable expectation that the SR will be met when performed, licensees should consider many factors. These factors include, but are not limited to, things such as the period of time since the SR was last performed, or whether the SR, or a portion thereof, has ever been performed, and many other indications, tests, or activities that might support the expectation that the SR will be met when performed. It is not sufficient to infer the behavior of the associated equipment from the performance of similar equipment. The rigor of determining whether there is a reasonable expectation an SR will be met when performed should increase based on the length of time since the last performance of the SR. If the SR has been performed recently, a review of the SR history and equipment performance may be

sufficient to support a reasonable expectation that the SR will be met when performed. For SRs that have not been performed for a long period, or that have never been performed, a rigorous evaluation based on objective evidence should provide a high degree of confidence that the equipment is capable of performing its specified safety function(s). The evaluation should be documented in sufficient detail to allow a knowledgeable individual to understand the basis for the determination.

The proposed change, which expands the scope of SR 3.0.3 to SRs that have never been performed, is acceptable because it requires that there to be an adequate determination of a reasonable expectation the SR will be met when performed. In addition, the proposed change augments plant safety since it could prevent unnecessary shutdowns by providing adequate time to complete SRs that have never been performed but are likely to achieve satisfactory results.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Minnesota State official was notified of the proposed issuance of the amendments on July 24, 2020. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change the requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding (85 FR 19511). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: C. Tilton, NRR

Date of Issuance: September 8, 2020

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT AND PRAIRIE ISLAND
 NUCLEAR GENERATING PLANT, UNITS 1 AND 2 – ISSUANCE OF
 AMENDMENT NOS. 204, 231, AND 219 RE: TSTF-529, “CLARIFY USE AND
 APPLICATION RULES” (EPID L-2020-LLA-0035) DATED SEPTEMBER 8, 2020

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