



2807 West County Road 75  
Monticello, MN 55362

July 22, 2022

L-MT-22-028  
10 CFR 50.55a(z)

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Monticello Nuclear Generating Plant  
Docket No. 50-263  
Renewed Facility Operating License  
No. DPR-22

Response to Request for Additional Information for the Monticello Nuclear Generating Plant Alternative Request VR-08 (EPID: L-MT-22-007)

References: 1) L-MT-22-007, Monticello 10 CFR 50.55a Request Associated with the Monticello Sixth Inservice Testing Ten-Year Interval OMN-28 (ADAMS Accession Number ML22067A084)

2) Email from the NRC to NSPM, "Request for Additional Information RE: Monticello Nuclear Generating Plant, Alternative VR-08, dated June 24, 2022 (ADAMS Accession Number ML22181A196)

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), submitted a Relief Request on March 7, 2022, (Reference 1) pursuant to 10 CFR 50.55a(z)(1), "Request Associated with the Monticello Sixth Inservice Testing Ten-Year Interval OMN-28," for the Monticello Nuclear Generating Plant (MNGP). The proposed Relief Request VR-08 requests to adopt ASME Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation".

On June 24, 2022, the U.S. Nuclear Regulatory Commission (NRC) requested additional information (Reference 2) from NSPM. The response to this RAI is provided in the following enclosure to this letter.

Summary of Commitments

This letter makes no new commitments and no revisions to existing commitments.

Document Control Desk  
L-MT-22-028  
Page 2

Should you have any questions or if additional information is needed, please contact Mary Emanuelson at (612) 330-5850 or [mary.emmanuelson@xcelenergy.com](mailto:mary.emmanuelson@xcelenergy.com).



Shawn C. Hafen  
Plant Manager, Monticello Nuclear Generating Plant  
Northern States Power Company – Minnesota

Enclosure

cc: Administrator, Region III, US NRC  
Project Manager, Monticello, US NRC  
Resident Inspector, Monticello, USNRC

**Response to Request for Additional Information RE:**

**Monticello Nuclear Generating Plant  
Alternative VR-08 Related to Adoption of ASME Code Case OMN-28**

**1.0 BACKGROUND**

In Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), submitted 10 CFR 50.55a Request VR-08 requesting adoption of American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants (OM) Code Case OMN-28, "Alternative Valve Position Verification Approach to Satisfy ISTC-3700 for Valves Not Susceptible to Stem-Disk Separation," for the Monticello Nuclear Generating Plant (MNGP). In Reference 2, the NRC requested additional information needed for the NRC staff to complete its review. NSPM's response to the NRC Request for Additional Information (RAI) is provided below.

**2.0 NRC REQUEST FOR ADDITIONAL INFORMATION AND NSPM RESPONSE**

EMIB-RAI-1

Requirement:

*The NRC regulations in Section 55a, "Codes and standards," in Part 50, "Domestic Licensing of Production and Utilization Facilities," in Title 10, "Energy," of the Code of Federal Regulations (10 CFR 50.55a) in paragraph (z), "Alternatives to codes and standards requirements," state the following:*

*Alternatives to the requirements of paragraphs (b) through (h) of this section or portions thereof may be used when authorized by the Director, Office of Nuclear Reactor Regulation. A proposed alternative must be submitted and authorized prior to implementation. The applicant of licensee must demonstrate that:*

- (1) Acceptable levels of quality and safety. The proposed alternative would provide an acceptable level of quality and safety; or*
- (2) Hardship without a compensating increase in quality and safety. Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.*

Issue:

*Note 1 to the tables in Alternative Request VR-08 states that "OMN-28 may be applied to all valves in the IST program that meet OMN-28 requirements in the future."*

Request:

*In that the NRC is being requested to authorize an alternative under 10 CFR 50.55a(z) to allow components to deviate from the 10 CFR 50.55a regulatory requirements, please identify the specific components by their ID numbers within the scope of Note 1 in Alternative Request VR-08.*

NSPM Response

The tables below provide valves that are within the scope of Alternative Request VR-08. These tables are consistent with those provided in Reference 1. A new relief request will be submitted for any additional valves determined to meet OMN-28 requirements in the future.

**Table 1 - MOVs, Motor Operated Valves**

Component ID	Component ID	Component ID	Component ID
MO-1426	MO-2015	MO-2068	MO-2-53A
MO-1751	MO-2020	MO-2071	MO-2-53B
MO-1752	MO-2021	MO-2075	MO-3502
MO-1753	MO-2022	MO-2076	MO-4085A
MO-1754	MO-2023	MO-2078	MO-4085B
MO-2002	MO-2029	MO-2096	MO-4086
MO-2003	MO-2030	MO-2100	MO-4229
MO-2006	MO-2032	MO-2101	MO-4230
MO-2007	MO-2033	MO-2102	MO-1986
MO-2008	MO-2034	MO-2106	MO-1987
MO-2009	MO-2035	MO-2107	MO-1988
MO-2010	MO-2036	MO-2373	MO-1989
MO-2011	MO-2061	MO-2374	MO-1741
MO-2012	MO-2062	MO-2397	MO-1742
MO-2013	MO-2063	MO-2398	MO-1749
MO-2014	MO-2067	MO-2407	MO-1750

**Table 2 - MV, Manual Valves**

Component ID
CS-13-1
CS-13-2
RHR-6-1
RHR-6-2
XP-8

**Table 3 - AOVs, Air Operated Valves**

Component ID	Component ID	Component ID	Component ID
CV-3-32A	AO-2-80A	AO-2382E	CV-3311
CV-3-32B	AO-2-80B	AO-2382F	CV-3312
CV-3-32C	AO-2-80C	AO-2382G	CV-3313
CV-3-32D	AO-2-80D	AO-2382H	CV-3314
CV-3-33A	AO-2-86A	AO-2382K	CV-2371
CV-3-33B	AO-2-86B	AO-2383	CV-2372
CV-3-33C	AO-2-86C	AO-2386	CV-2082A
CV-3-33D	AO-2-86D	AO-2387	CV-2104
CV-2046A	AO-2377	AO-2896	CV-2790
CV-2065	AO-2378	AO-4539	CV-2791
CV-1478	AO-2379	AO-4540	CV-1994
CV-7956	AO-2380	CV-2384	CV-1995
AO-2541A	AO-2381	CV-2385	CV-1996
AO-2541B	AO-2382A	CV-3267	CV-1997
AO-2561A	AO-2382B	CV-3268	CV-1728
AO-2561B	AO-2382C	CV-3269	CV-1729

### 3.0 REFERENCES

1. L-MT-22-007, "Monticello Nuclear Generating Plant 10 CFR 50.55a Request No. VR-08, Request to Adopt ASME Code Case OMN-28," submission date March 7, 2022 (ADAMS Accession No. ML22067A084)
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