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Xcel Energy
Docket No.: EL12-046
Response To: SD Public Utilities Commission Data Request No. 1-5
Requestor: Brittany Mehlhaff & Patrick Steffensen
Date Received: November 13, 2013

Question:

Regarding the Monticello Fire Model project:

a) Is the additional scope included in the parent work order 11043842? Was additional management/board approval required for the additional scope? If so, please provide documentation.
b) The compliance filing states the in-service date moved to December 2013. According to the "Monti Fire Model" tab of "Infrastructure Rider Filing 2014 Rate.xls" provided on 10/08/2013, it appears there is another addition occurring in December 2014. Please explain.

Response:

a) Yes, the additional scope was included in the parent work order 11043842. No additional management or Board approval was required for the scope changes.

   The level of cost increase from additional scope is below the 20% CWIP increase threshold required to obtain additional management approval. The project was originally approved by Financial Council at $9.8 million and is now forecasted to be $11.4 million, an increase of about 16%.

   Also, specific Board approval is not required on projects of this size (less than $25 million) or for those nuclear projects deemed to be mandated by a regulated agency, such as this one.

b) Previously, this entire project was planned to go in-service in 2013. Currently, the project is planned to go in-service in two phases.

The first phase, expected to go in-service in 2013, is an update of the internal events risk model to comply with the Nuclear Regulatory Commission's *Regulatory Guide 1.200 An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities.* This phase is on-track for in-service completion for December 2013.

The second phase, expected to go in-service in 2014 and 2015, is the Fire Probabilistic Risk Assessment (PRA) Model which the Nuclear Regulatory Commission (NRC) requires to meet the American Society of Mechanical Engineers (ASME) standard for PRA and to be peer-reviewed.

The delay in the schedule for the second phase of this project is due to the focus on phase one in 2013, and reflects more ongoing work necessary to maintain compliance with a highly-programmatic and ever-changing nuclear regulatory environment. In order to complete this phase, the project requires the following items to support compliance with ASME standards required to be met by the NRC:

- Analysis of plant electrical circuits;
- Fire Model development and PRA; and
- Transition analysis and design requirements for cables, physical barriers, plant configuration, and fire protection systems.

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