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May 16, 2014

Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

EA-12-049
Serial No.: 14-251
NL&OS/MAE: R6
Docket No.: 50-423
License No.: NPF-49

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 3
ORDER MODIFYING LICENSES WITH REGARD TO REQUIREMENTS FOR
MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS
DATED MARCH 12, 2012
RELAXATION REQUEST

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued Order EA-12-049 for Mitigation Strategies for Beyond-Design-Basis External Events (the Order) to all operating nuclear power reactor licensees. Dominion Nuclear Connecticut, Inc. (DNC) responded to the Order on March 26, 2012, October 25, 2012, February 28, 2013, April 30, 2013, August 6, 2013 and February 28, 2014 for Millstone Power Station Unit 3 (MPS3).

Pursuant to Section IV of the Order, a request to relax Condition A.2 is provided in the attachment to this letter. The relaxation of the Order will allow the delay of full implementation of the Order from the completion of the fall 2014 outage to April 30, 2015 for MPS3 in order to complete beyond-design-basis operator training. If you have any questions, please contact Ms. Margaret A. Earle at (804) 273-2768.

Sincerely,

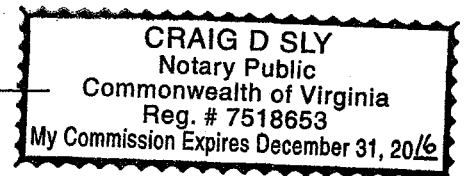
Mark D. Sartain
Vice President - Nuclear Engineering
Dominion Nuclear Connecticut, Inc.

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain who is Vice President Nuclear Engineering of Dominion Nuclear Connecticut, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 16th day of May, 2014.

My Commission Expires: 12/31/16 Craig D Sly
Notary Public



Attachment: Order EA-12-049 Mitigation Strategies for Beyond-Design-Basis External Events
Request for Relaxation of Condition A.2

Commitments made by this letter: None

cc: Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
Millstone Power Station

Attachment

Order EA-12-049

Mitigation Strategies for Beyond-Design-Basis External Events

Request for Relaxation of Condition A.2

Millstone Power Station Unit 3

Dominion Nuclear Connecticut, Inc.

Order EA-12-049 Mitigation Strategies for Beyond-Design-Basis External Events Request for Relaxation of Condition A.2

Relaxation Request

In accordance with Section IV of Order EA-12-049, Mitigation Strategies for Beyond-Design-Basis External Events (the Order), Dominion Nuclear Connecticut, Inc. (DNC) requests that the Order be relaxed for Millstone Power Station (MPS) Unit 3 (MPS3) such that the full implementation date for the Order would be April 30, 2015. Condition A.2 of the Order requires that licensees "shall complete full implementation no later than two (2) refueling cycles after submittal of the overall integrated plan, as required in Condition C.1.a, or December 31, 2016, whichever comes first." The MPS3 overall integrated plan for the Order was submitted on February 28, 2013. Therefore, the second refueling cycle for MPS3 is the fall 2014 outage.

DNC requests relaxation of the MPS3 full implementation date from the fall 2014 outage to April 30, 2015 to allow operator training on beyond-design-basis procedures to be performed in 2015. This relaxation request is based on unique 2014 training challenges for MPS3.

With the exception of operator training, the remainder of the Order requirements would be fully implemented by the end of the fall 2014 outage. Furthermore, full implementation of the Order will continue to be fulfilled prior to December 31, 2016, as specified by the Order.

Background

DNC has been actively involved with the industry response to the Order by participating in various Task Forces that developed the industry guidance. DNC has an achievable plan for the implementation of the Order requirements on MPS3 by the end of the fall 2014 outage. MPS3 modifications, equipment purchases, procedure development, and storage building installation associated with the Order have either been completed or are on schedule for completion by the end of the fall 2014 outage.

Discussion

MPS has two (2) outages in 2014. One is in the spring (MPS Unit 2 (MPS2)) and the other is in the fall (MPS3). Training is not conducted during outages due to the need for the operators and instructors to focus on the nuclear safety aspects of the outage. Therefore, the available window for operator training associated with the Order is between the current MPS2 spring outage and the MPS3 fall outage (roughly a five (5) month period between mid-May and mid-October).

MPS3 is included in the first set of units scheduled to reach the full implementation date for the Order. Even though MPS3 is on schedule for completion of FLEX Support Guidelines (FSGs),

the final versions of the FSGs are not scheduled to be completed until just prior to the fall outage. This does not provide sufficient time to train operators on finalized FSGs, therefore, the training associated with the Order is currently planned to be based on draft FSGs. This is inconsistent with the normal training approach, which is to train on completed procedures, but necessary due to the compressed schedules associated with the Order. Additional training will be required to supplement the training on the draft FSGs if it is identified that significant changes in the FSGs are required. Although this is not a preferred approach to operator training for the Order, it would allow compliance with the implementation of the Order requirements on MPS3 by the end of the fall 2014 outage.

MPS3 has unique training schedule challenges in 2014 related to implementation of the Order. During the five (5) month period from mid-May to mid-October, MPS Training must prepare for several non-routine operator training evaluations. The operators have to be prepared for the Crew Performance Evaluation (CPE), which is a critical input to the World Association of Nuclear Operators (WANO) evaluation in August and reviewed during the accreditation renewal of the Millstone Operations Training Programs. The CPE consists of evaluating eight (8) crews (for MPS2 and MPS3) and occurs once every two (2) years over a two (2) week period. The CPE is currently scheduled for July 2014. Training will also be needed to prepare for the Accreditation Team Visit (ATV) from INPO, which occurs right after the fall outage in December 2014. The ATV occurs once every four (4) years and lasts for one (1) week. Additionally, the MPS Hostile Action Based Drill is scheduled for September 2014. The Hostile Action Based Drill requires two (2) weeks of training preparation time, which includes personnel training and scenario validation.

These non-routine training efforts make it difficult to complete operator training on FSGs for beyond-design-basis strategies without competing for time and resources to complete core training activities related to design basis events that are part of mandatory operator training. A significant amount of core training activities are required to be conducted in order to satisfy the accreditation requirements for the Licensed Operator Continuing Training Program. The biennial licensed operator written examination, and annual job performance measures and simulator examinations (NRC Inspection Procedure 71111.11) require preparation time by the Training Department to develop the examinations, and conduct the examinations. The annual job performance measures and simulator examinations are scheduled for September 2014, with biennial written examination occurring following the fall 2014 outage. In addition, training prior to outages is an essential part of nuclear safety. The Training Department is responsible for developing and providing operator training to ensure a safe and event-free outage.

Assuming the full implementation date for the Order is not extended, the combination of routine and non-routine required training, in addition to the beyond-design-basis training, sets up a situation where limited time is available to focus on each of these important subjects and could potentially introduce confusion for the operators. In an effort to accommodate required training, the number of hours that operators are trained each week has been extended from 32 hours to 40 hours. The time dedicated to training, in combination with operator work hours

(including scheduled work hours and overtime) is limited by the work hour requirements in 10 CFR 26.

Extending the full implementation date for the Order from the end of the fall 2014 outage to April 30, 2015 would permit the first two (2) training cycles in 2015 to be focused on the training associated with the Order. This allows the operators to focus on the new FSGs and tasks resulting from the implementation of the Order without the distraction of competing priorities. Each operating crew attends one week of training during a training cycle. A training cycle is six (6) weeks long based on five (5) operating crews and a week for piloting the training material. At the conclusion of the first training cycle of 2015 all operators will be trained on the new FLEX support equipment, FSGs, and the new tasks associated with the equipment. As a result, the operators would be able to operate the FLEX support equipment, if required, utilizing the installed operator job aids. At the conclusion of the second cycle, all operators will have been trained on the MPS3 application of the new equipment and FSGs, including a plant walk down. Upon completion of the second cycle, the operators will be fully qualified to perform the new tasks to implement the FLEX strategies required to mitigate a beyond-design-basis external event.

Conclusion

MPS3 has unique training challenges in 2014. These unique training challenges make it difficult to complete operator training related to the Order as rigorously as MPS would prefer, and without competing priorities of design base and non-routine training requirements. The extension of the full implementation date would allow focused training cycles for the training on equipment and strategies required by the Order. The extension of the full implementation date would only affect the completion of the operator training. All other Order requirements for MPS3 will be fully implemented prior to the end of the fall 2014 outage. Based on the unique training challenges in 2014, DNC has good cause to request the extension of the full implementation date of the Order to April 30, 2015.