Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Dominion

JUL 31 2001

Docket No. 50-336
B18444

RE: 10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 2
Technical Specifications Change Request (TSCR) 2-11-01
Elimination of Requirements for the Post Accident Sampling System (PASS)
Using the Consolidated Line Item Improvement Process (CLIIP)

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC), hereby proposes to amend Operating License DPR-65 by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit No. 2. DNC is proposing to delete Millstone Unit No. 2 Technical Specification 6.18, "PASS/Sampling and Analysis of Plant Effluents." Millstone Unit No. 2 Index page XVII will be modified to address the proposed change. The proposed changes will eliminate the requirement to have and maintain a PASS from the Millstone Unit No. 2 Technical Specifications.

The proposed changes are consistent with the industry initiative for the elimination of requirements to have and maintain a PASS as delineated in the May 16, 2000, Nuclear Regulatory Commission (NRC) Safety Evaluation Report[1] for the Combustion Engineering Owners Group Joint Applications Report CE NPSD-1157.[2] The proposed changes are also consistent with the NRC guidance and model safety evaluation published in the Federal Register[3] on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

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(1) Nuclear Regulatory Commission, "Safety Evaluation Related to the Combustion Engineering Joint Application Report," CE NPSD-1158, Revision 1, TAC No. MA5661, dated May 16, 2000.

(2) Combustion Engineering Owners Group (CEOG) Topical Report CE NPSD-1157, Revision 1, "Technical Justification for the Elimination of the Post-Accident Sampling System from the Plant Design and Licensing Basis for CEOG Utilities," dated March 30, 2000.

(3) Federal Register "Notice of Availability for Referencing in License Amendment Applications - Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process," 65 FR 65018, dated October 31, 2000.

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Attachment 1 provides the regulatory commitments associated with this license amendment request. DNC will utilize existing PASS equipment and procedures as our contingency plan for obtaining and analyzing highly radioactive samples of reactor coolant, the containment sump, and the containment atmosphere until an alternative methodology is developed. Attachment 2 provides a discussion of the proposed change, Safety Summary, and Basis for No Significant Hazards Consideration. Attachment 3 provides the marked-up version of the appropriate pages of the current Technical Specifications. Attachment 4 provides the retyped pages of the Technical Specifications.

Environmental Considerations

DNC has reviewed the environmental evaluation included in the Model Safety Evaluation published in the Federal Register on October 31, 2000, as part of the CLIIP. DNC has concluded that the Staff's findings presented in that evaluation are applicable to Millstone Unit No. 2 and the evaluation is hereby incorporated by reference for this application.

Conclusions

The proposed changes do not involve a significant impact on public health and safety and does not involve a Significant Hazards Consideration pursuant to the provisions of 10 CFR 50.92 (see Attachment 2). In addition, the proposed changes are safe.

Site Operations Review Committee and Nuclear Safety Assessment Board

The Site Operations Review Committee and Nuclear Safety Assessment Board have reviewed and concurred with the determinations.

Schedule

We request issuance of this amendment for Millstone Unit No. 2 prior to December 31, 2001, with the amendment to be implemented within 60 days of issuance.

State Notification

In accordance with 10 CFR 50.91(b), a copy of this License Amendment Request is being provided to the State of Connecticut.

If you should have any questions concerning this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

J. Alan Price, Vice President
Nuclear Technical Services - Millstone

Sworn to and subscribed before me

this 31 day of July, 2001

Donnalynne Williams
Notary Public

My Commission expires Nov 30, 2001

Attachments (4)

cc: H. J. Miller, Region I Administrator
J. T. Harrison, NRC Project Manager, Millstone Unit No. 2
S. R. Jones, Senior Resident Inspector, Millstone Unit No. 2

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by DNC in this document.

NUMBER	REGULATORY COMMITMENT	DUE
B18444-01	DNC shall maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, the containment sump, and the containment atmosphere. These contingency plans are contained within the Chemistry Department implementing procedures.	Complete
B18444-02	DNC shall maintain the capability for classifying fuel damage events at the Alert level threshold. This capability is described within the Emergency Plan implementing procedures.	Complete
B18444-03	DNC shall maintain the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described within the Emergency Plan implementing procedures.	Complete

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Technical Specifications Change Request (TSCR) 2-11-01
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Using the Consolidated Line Item Improvement Process (CLIIP)
Discussion of Proposed Changes and Assessment

Technical Specifications Change Request (TSCR) 2-11-01
Elimination of Requirements for the Post Accident Sampling System (PASS)
Using the Consolidated Line Item Improvement Process (CLIIP)
Discussion of Proposed Changes and Assessment

Background

In the aftermath of the accident at Three Mile Island (TMI), Unit 2, the Nuclear Regulatory Commission (NRC) imposed requirements on licensees for commercial nuclear power plants to install and maintain the capability to obtain and analyze post-accident samples of the reactor coolant and containment atmosphere. The desired capabilities of the Post Accident Sampling System (PASS) were described in NUREG–0737, "Clarification of TMI Action Plan Requirements." The NRC issued orders to licensees with plants operating at the time of the TMI accident to confirm the installation of PASS capabilities.

In a letter dated May 5, 1999, (as supplemented by letter dated April 14, 2000), the Combustion Engineering Owners Group (CEOG) submitted the topical report CE NPSD–1157, Revision 1, "Technical Justification for the Elimination of the Post-Accident Sampling System From the Plant Design and Licensing Bases for CEOG Utilities." The report provided evaluations of the information obtained from PASS samples to determine the contribution of the information to plant safety and accident recovery. The report considered the progression and consequences of core damage accidents and assessed the accident progression with respect to plant abnormal and emergency operating procedures, severe accident management guidance, and emergency plans. The report provided the CEOGs' technical justifications for the elimination of various PASS sampling requirements. The NRC approved the CEOG topical report on March 30, 2000. Thereafter, the NRC staff prepared a model safety evaluation relating to the elimination of requirements for post accident sampling and solicited public comment (65 FR 49271) in accordance with the consolidated line item improvement process (CLIIP). The availability of the model safety evaluation for the Technical Specification (TS) improvement was announced in the Federal Register[1] on October 31, 2000, as part of the CLIIP.

Proposed Changes

Dominion Nuclear Connecticut, Inc. (DNC), hereby proposes to amend Operating License DPR-65 by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit No. 2. DNC is proposing to delete the programmatic

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[1] Federal Register "Notice of Availability for Referencing in License Amendment Applications - Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems Using the Consolidated Line Item Improvement Process," 65 FR 65018, dated October 31, 2000.

requirements associated with the PASS. The following changes are proposed, Millstone Unit No. 2 Technical Specification 6.18, "PASS/Sampling and Analysis of Plant Effluents" will be deleted. Index page XVII will be modified to reflect the above change. The proposed changes are consistent with the NRC approved Technical Specification Task Force (TSTF) Traveler TSTF-366, "Elimination of Requirements for a PASS." The proposed changes are also consistent with NRC guidance and the model safety evaluation for this technical specification change as announced in the Federal Register on October 31, 2000, as part of the CLIIP.

Safety Summary

DNC has reviewed the safety evaluation published in the Federal Register on October 31, 2000, as part of the CLIIP and concluded that the justifications presented in the TSTF proposal and the NRC Safety Evaluation for CE NPSD-1157, Revision 1, are applicable to Millstone Unit No. 2 and justify the incorporation of the proposed changes for the elimination of the PASS from the facility licensing basis.

Optional Changes and Variations

DNC is not proposing any technical variations or deviations from TSTF-366 or from the NRC model safety evaluation published in the Federal Register on October 31, 2000.

Millstone Unit No. 2 Technical Specification 6.13, "System Integrity" provides requirements for minimizing leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. Millstone Unit No. 2 Technical Specification Bases, 3/4.3.3.8, "Accident Monitoring Instrumentation" includes a discussion of minimum operability requirements for post-accident monitoring instrumentation. As described in the model safety evaluation published on October 31, 2000, the elimination of the TS and other regulatory requirements for the PASS may result in additional changes to TSs due to discussion of the PASS within these sections. The changes suggested are associated with facilities that have converted to the Improved Technical Specifications (ITS), e.g. NUREG-1432, Standard Technical Specifications - Combustion Engineering Plants. Millstone Unit No. 2 has yet to convert to ITS. A review of the corresponding Millstone Unit No. 2 Technical Specification 6.13, "System Integrity" and Bases, 3/4.3.3.8, "Accident Monitoring Instrumentation," indicates that the PASS is not explicitly identified within these sections, and therefore these sections do not require revision since they do not contain the detail in wording required by ITS.

Basis for No Significant Hazards Consideration

DNC has reviewed the proposed no significant hazards consideration determination published in the Federal Register on October 31, 2000, as part of the CLIIP and concluded that the proposed determination presented in this notice is applicable to Millstone Unit No. 2 and therefore, this determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Verifications and Commitments

As discussed in the model safety evaluation for this technical specification improvement published in the Federal Register on October 31, 2000, DNC has performed plant-specific verification as follows:

1. DNC shall maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, the containment sump, and the containment atmosphere. These contingency plans are contained within the Chemistry Department implementing procedures.

2. DNC shall maintain the capability for classifying fuel damage events at the Alert level threshold. This capability is described within the Emergency Plan implementing procedures.

3. DNC shall maintain the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described within the Emergency Plan implementing procedures.

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Attachment 3

Millstone Nuclear Power Station, Unit No. 2

Technical Specifications Change Request (TSCR) 2-11-01
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Using the Consolidated Line Item Improvement Process (CLIIP)
Marked Up Pages

Technical Specifications Change Request (TSCR) 2-11-01
Elimination of Requirements for the Post Accident Sampling System (PASS)
Using the Consolidated Line Item Improvement Process (CLIIP)
Marked Up Pages

A change to the following Technical Specification pages has been proposed.

Technical Specification Section Number	Title of Section	Page Number
6.18	PASS/Sampling and Analysis of Plant Effluents	6-25
	Index	XVII

6.16 RADIOACTIVE WASTE TREATMENT

Procedures for liquid and gaseous radioactive effluent discharges from the Unit shall be prepared, approved, maintained, and adhered to for all operations involving offsite releases of radioactive effluents. These procedures shall specify the use of appropriate* waste treatment utilizing the guidance provided in the REMODCM.

6.17 SECONDARY WATER CHEMISTRY

A program shall be maintained for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

1. Identification of a sampling schedule for the critical variables and control points for these variables.

2. Identification of the procedures used to measure the values of the critical variables,

3. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage.

4. Procedures for the recording and management of data.

5. Procedures defining corrective actions for all off-control point chemistry conditions, and

6. A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

6.18 PASS/Sampling and Analysis of Plant Effluents

A program shall be established, implemented and maintained which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

(i) Training of personnel,
(ii) Procedures for sampling and analysis,
(iii) Provisions for maintenance of sampling & analysis equipment.

*The Solid Radioactive Waste Treatment System shall be operated in accordance with the Process Control Program to process wet radioactive wastes to meet shipping and burial ground requirements.

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Attachment 4

Millstone Nuclear Power Station, Unit No. 2

Technical Specifications Change Request (TSCR) 2-11-01
Elimination of Requirements for the Post Accident Sampling System (PASS)
Using the Consolidated Line Item Improvement Process (CLIIP)
Retyped Pages

6.16 RADIOACTIVE WASTE TREATMENT

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3. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage.

4. Procedures for the recording and management of data.

5. Procedures defining corrective actions for all off-control point chemistry conditions, and

6. A procedure identifying: (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective action.

6.18 Deleted

*The Solid Radioactive Waste Treatment System shall be operated in accordance with the Process Control Program to process wet radioactive wastes to meet shipping and burial ground requirements.