

August 14, 2001

MEMORANDUM TO: James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: John Harrison, Project Manager, Section 2 **/RA/**
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2, FACSIMILE
TRANSMISSION OF ISSUES TO BE DISCUSSED IN AN UPCOMING
TELEPHONE CONFERENCE CALL (TAC NO. MB1779)

The attached information was transmitted by facsimile on August 13, 2001, to Mr. Ravi Joshi of Dominion Nuclear Connecticut, Inc. (the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's submittal dated April 11, 2001. In the submittal, the licensee requested to revise the Millstone Unit 2 Technical Specification definitions of "Core Alteration," "Refueling Operations - Boron Concentration," "Refueling Operations - Instrumentation," and "Refueling Operations - Water Level - Reactor Vessel." This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket No. 50-336

Attachment: Issues for Discussion in Upcoming Telephone Conference

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**Issues for Discussion in Upcoming Telephone Conference
Related to Dominion Technical Specification Change Request 2-3-01,
Dated April 11, 2001
Millstone 2 Core Alteration and Refueling Operations Definitions
TAC MB1779**

1. Item 3.b of the license amendment request proposes to divide TS 3.9.2 ACTION statement into two statements, ACTION 'a' and ACTION 'b'. ACTION 'b' will address the inoperability of two source range neutron flux monitors and will require that the boron concentration of the RCS be verified to satisfy the requirements of LCO 3.9.1 within 4 hours and at least once per 12 hours thereafter. Your application states that, "These changes will ensure that immediate action is taken to restore at least one monitor..." However, the proposed change does not include any action to restore at least one monitor. NUREG-1432 Revision 2 STS 3.9.2 ACTION B requires the immediate initiation action to restore one SRM to OPERABLE status in addition to verifying the boron concentration. Please provide justification why STS Action B.1 is not included in your request.
2. The marked up copy of current TS 3.9.2 shows the addition of the words, "and control room." in LCO 3.9.2. However, the propose change does not appear to be discussed in the submittal. Provide appropriate justification for the proposed change.
3. Item 3.c of the license amendment request proposes to delete SR 3.9.2.a and 3.9.2.b and replace them with one surveillance requirement. SR 3.9.2.a and SR 3.9.2.b requires that each source range neutron flux monitor shall be demonstrated OPERABLE by performance of 1. A CHANNEL FUNCTIONAL TEST at least once per seven days and 2. A CHANNEL FUNCTIONAL TEST within eight hours prior to the start of CORE ALTERATIONS. The new surveillance requirement (SR 3.9.2.b) would require the performance of a channel calibration at least once per 18 months. The licensee stated that the channel functional test only provides indication of the neutron flux level in the core, while the channel calibration would ensure the instrument channels are properly aligned. Provide more information/justification as to why the channel calibration at an 18 month interval sufficiently replaces or improves the current surveillance requirements (SR 3.9.2.a and b) with surveillance intervals of 7 days and 8 hours prior to core alterations.
4. Item 4 of the license amendment request proposes to change the LCO, APPLICABILITY and ACTION statement of TS 3.9.11. The propose wording of the ACTION statements states "immediately suspend CORE ALTERATIONS and immediately suspend movement of irradiated fuel assemblies with containment." The proposed ACTION statement does not state a condition with which the action is required, i.e., with the water level less than that specified above. The proposed ACTION statement needs to be revised to include a condition for which the action is taken.