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

Dominion

SEP 26 2001

Docket No. 50-336
B18486

RE: 10 CFR 50.90

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

Millstone Power Station, Unit No. 2
Second Response to a Request for Additional Information
Technical Specifications Change Request 2-6-00
Emergency Diesel Generator Allowed Outage Time (TAC MB2196)

In a letter dated May 31, 2001,[1] Dominion Nuclear Connecticut, Inc. (DNC) requested a change to the Millstone Unit No. 2 Technical Specifications. The purpose of the proposed Technical Specification change was to increase the allowed outage time for one inoperable emergency diesel generator. During a conference call conducted on September 11, 2001, DNC addressed numerous questions from a Nuclear Regulatory Commission staff reviewer. The questions were transmitted by a facsimile dated September 6, 2001.[2] The purpose of this letter is to transmit the requested written responses, which are contained in Attachment 1. In addition, modifications have been made to the associated Technical Specification Bases as a result of the responses provided to these questions. Attachment 2 contains the revised Bases page. This letter does not affect the conclusions of the Safety Summary and Significant Hazards Consideration submitted with the original license amendment request.

There are no regulatory commitments contained within this letter.

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(1) R. P. Necci letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Technical Specifications Change Request 2-6-00, Emergency Diesel Generator Allowed Outage Time," dated May 31, 2001.

(2) J. Harrison (NRC) facsimile to Dominion Nuclear Connecticut, Inc., "Issues for Discussion in Upcoming Telephone Conference, Related to Dominion Technical Specification Change Request 2-6-00, Dated May 31, 2001, Emergency Diesel Generator Allowed Outage Time, TAC MB2196," dated September 6, 2001.

A001

If you should have any questions on the above, 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 26th day of September, 2001

Notary Public

My Commission expires

SANDRA J. ANTON
NOTARY PUBLIC
COMMISSION EXPIRES
MAY 31, 2005

Attachments (2)

cc: H. J. Miller, Region I Administrator
J. T. Harrison, NRC Project Manager, Millstone Unit No. 2
NRC 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 Power Station, Unit No. 2

Second Response to a Request for Additional Information
Technical Specifications Change Request 2-6-00
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Written Responses

Second Response to a Request for Additional Information
Technical Specifications Change Request 2-6-00
Emergency Diesel Generator Allowed Outage Time (TAC MB2196)
Written Responses

In a letter dated May 31, 2001,[1] Dominion Nuclear Connecticut, Inc. (DNC) requested a change to the Millstone Unit No. 2 Technical Specifications. The purpose of the proposed Technical Specification change was to increase the allowed outage time (AOT) for one inoperable emergency diesel generator (EDG). During a conference call conducted on September 11, 2001, DNC addressed six questions from a Nuclear Regulatory Commission staff reviewer. The questions were transmitted by a facsimile dated September 6, 2001.[2] The questions and associated responses to four of the questions are presented below. Two additional questions were discussed. However, information contained in the submittal dated May 31, 2001, adequately addressed the questions and no further response was requested.

Question 1

The plant technical specifications should contain verification that the required systems, subsystems, trains, components, and devices that depend on the remaining EDG as a source of emergency power are operable before removing an EDG for maintenance. In addition, positive measures should be taken to preclude subsequent testing or maintenance activities on these systems, subsystems, trains, components, and devices while an EDG is inoperable.

Response

The Millstone Unit No. 2 Technical Specifications already contain the requirement to verify the operability of the required systems, subsystems, trains, components, and devices that depend on the remaining EDG as a source of emergency power in Technical Specification 3.0.5. When removing an EDG from service, all systems, subsystems, trains, components, and devices associated with that EDG are inoperable based on the Millstone Unit No. 2 definition of operable, which requires both normal and emergency electrical power sources to be available. Since the associated EDG is the emergency power source, the operability requirements will not be met when the EDG is removed from service. However, Technical Specification 3.0.5 specifies that the associated systems, subsystems, trains, components, and devices can be considered

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(1) R. P. Necci letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Technical Specifications Change Request 2-6-00, Emergency Diesel Generator Allowed Outage Time," dated May 31, 2001.

(2) J. T. Harrison (NRC) facsimile to Dominion Nuclear Connecticut, Inc., "Issues for Discussion in Upcoming Telephone Conference, Related to Dominion Technical Specification Change Request 2-6-00, Dated May 31, 2001, Emergency Diesel Generator Allowed Outage Time, TAC MB2196," dated September 6, 2001.

operable provided the corresponding normal power supply is operable, and all redundant systems, subsystems, trains, components, and devices are operable. If any of the redundant equipment is not operable, restoration is required within 2 hours or the plant must be shut down.

The provisions of Technical Specification 3.0.5 and the associated operability definition already provide positive control over the redundant equipment when the opposite facility EDG has been removed from service. If any of the redundant equipment were to become inoperable due to testing or maintenance activities at a later time, the 2 hour restoration and plant shut down requirements would apply. Since Technical Specification 3.0.5 already contains the requested verification and positive control measures of the redundant equipment to ensure that a loss of safety function does not occur when an EDG has been removed from service, no additional changes are necessary.

Question 2

Voluntary entry into a limiting condition for operation (LCO) action statement should not be scheduled when unstable grid conditions are expected.

Response

As stated in the submittal dated May 31, 2001, DNC will use the Millstone Power Station Configuration Risk Management Program (CRMP), as required by 10 CFR 50.65(a)(4), to manage plant configuration changes for planned and unplanned work on the EDGs, as well as the maintenance of equipment having risk significance. The CRMP will ensure that these activities are carried out with no significant adverse impact on aggregate plant risk and public health and safety. The acceptability of the proposed increase in the allowed outage time for one EDG to 14 days is based on the use of the Millstone Power Station CRMP, and the following additional activity specific requirements. These additional requirements, which were contained in the original submittal and are applicable when using the extended allowed outage time, have been modified to address unstable grid conditions.

1. The extended diesel generator outage will not be scheduled when adverse or inclement weather conditions and/or unstable grid conditions are predicted or present.

2. Millstone Unit No. 3 EDGs will be operable, as required by Millstone Unit No. 3 Technical Specifications, during the extended EDG outage.

3. The availability of the Millstone Unit No. 3 Station Blackout Diesel Generator will be verified by test performance within the previous 30 days prior to allowing a Millstone Unit No. 2 diesel generator to be inoperable for greater than 72 hours.

4. While in the proposed extended EDG AOT, additional elective equipment maintenance or testing that requires the equipment to be removed from service will be evaluated and activities that yield unacceptable results will be avoided.

5. All activity in the switchyard will be closely monitored and controlled. No elective maintenance within the switchyard that could challenge offsite power availability will be scheduled.

Use of a CRMP will ensure the risk impact of out-of-service equipment is appropriately evaluated prior to performing a maintenance activity, and the aggregate plant risk is controlled.

Question 3

Any component testing or maintenance that increases the likelihood of a plant transient should be avoided.

Response

Use of the Millstone Power Station CRMP and the additional requirements specified in the response to Question 2 above will control component testing or maintenance that could increase the likelihood of a plant transient.

Question 4

Switchyard access will be controlled. All activity in the switchyard will be closely monitored and controlled. No activity in the switchyard will be allowed that could challenge the operability of the [offsite power circuits].

Response

Use of the Millstone Power Station CRMP and the additional requirements specified in the response to Question 2 above will ensure switchyard access and associated activities are adequately controlled during extended EDG outages. These additional requirements, which were contained in the original submittal and are applicable when using the extended allowed outage time, have been modified to address switchyard activities.

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Attachment 2

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Revised Bases Page

The 14 day allowed outage time for one inoperable Millstone Unit No. 2 diesel generator will allow performance of extended diesel generator maintenance and repair activities (e.g., diesel inspections) while the plant is operating. To minimize plant risk when using this extended allowed outage time the following additional requirements must be met:

1. The extended diesel generator maintenance outage shall not be scheduled when adverse or inclement weather conditions and/or unstable grid conditions are predicted or present.

2. The availability of the Millstone Unit No. 3 SBO DG shall be verified by test performance within the previous 30 days prior to allowing a Millstone Unit No. 2 diesel generator to be inoperable for greater than 72 hours.

3. All activity in the switchyard shall be closely monitored and controlled. No elective maintenance within the switchyard that could challenge offsite power availability shall be scheduled.

In addition, the plant configuration shall be controlled during the diesel generator maintenance and repair activities to minimize plant risk consistent with a Configuration Risk Management Program, as required by 10 CFR 50.65(a)(4).

During performance of Surveillance Requirements 4.8.1.1.2.a.2 and 4.8.1.1.2.d.2, the diesel generators shall be started by using one of the following signals:

1. Manual;

2. Simulated loss of offsite power in conjunction with a safety injection actuation signal;

3. Simulated safety injection actuation signal alone; or

4. Simulated loss of power alone.

The diesel generator surveillance requirements specify that the diesel generators are started from a standby condition. Standby conditions for a diesel generator means the diesel engine coolant and oil are being circulated and temperature is being maintained consistent with manufacturer recommendations.

Surveillance Requirement (SR) 4.8.1.1.2.d.1 verifies that the diesel generators will reach $\geq$ 90% of rated speed and $\geq$ 97% of rated voltage within 15 seconds after a start signal is generated. Diesel generator voltage and speed will continue to increase to rated values, and then should stabilize. The time for voltage and speed (frequency) to stabilize is periodically monitored and the trend evaluated to identify degradation of governor or voltage regulator performance when testing in accordance with the requirements of SR 4.8.1.1.2.d.1.