

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



**Dominion**<sup>SM</sup>

NOV 13 2001

Docket No. 50-423  
B18487

RE: 10 CFR 50.90

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

Millstone Nuclear Power Station, Unit No. 3  
License Condition - Isolated RCS Loop Operation  
Technical Specifications Change Request 3-11-00  
Reactor Coolant System Heatup and Cooldown Curves

In a letter dated April 23, 2001,<sup>(1)</sup> Dominion Nuclear Connecticut, Inc. (DNC), requested changes to the Millstone Unit No. 3 Technical Specifications. The proposed changes were primarily associated with revised Reactor Coolant System (RCS) pressure/temperature limit curves and cold overpressure protection limit curves. Additional related changes to Technical Specification 3.4.1.6, "Reactor Coolant System - Isolated Loop Startup," were included. Some of the proposed changes to Technical Specification 3.4.1.6 affect restrictions that were in part based on the original Millstone Unit No. 3 licensing basis that allowed power operation with one isolated RCS loop (loop isolation valves shut). However, Millstone Unit No. 3 has not previously used this provision, and has no intention of using it in the future. This position has been documented by a letter dated January 12, 1998.<sup>(2)</sup> In support of this position, DNC requests the following License Condition, as discussed during several telephone conference calls in September and October 2001, be included with the proposed changes to Technical Specification 3.4.1.6.

Operation with one or more isolated Reactor Coolant System (RCS) loops in Modes 1 through 4 is prohibited, except for mitigation of abnormal or emergency events when operating in Modes 3 or 4. This condition will expire upon implementation of modifications to the Millstone Unit No. 3 Technical Specifications, Final Safety Analysis Report, and plant procedures to remove the option for power operation with one isolated RCS loop (N-1 operation).

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- (1) E. S. Grecheck letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, Technical Specifications Change Request 3-11-00, Reactor Coolant System Heatup and Cooldown Curves," dated April 23, 2001.
- (2) J. P. McElwain letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, Modification of Licensing Basis for N-1 Loop Operation," dated January 12, 1998.

ADD1

The Millstone Unit No. 3 Technical Specifications currently allow power operation with one isolated RCS loop. Technical Specification 3.4.1.5, "Reactor Coolant System - Isolated Loop," and Technical Specification 3.4.1.6 provide adequate administrative controls to ensure that an isolated loop is only restored to service when the plant is in Mode 5 or 6. However, these two specifications alone will not prevent operation in Modes 1 through 4 with an isolated loop. By adding the proposed License Condition, all operation in Modes 1 or 2 with an isolated RCS loop will be prohibited, and operation in Modes 3 and 4 with an isolated RCS loop will only be allowed for abnormal or emergency event mitigation as directed by abnormal or emergency operating procedures. For example, if a steam generator tube rupture occurred in Mode 1 or 2, the plant would be immediately shut down to Mode 3 by a reactor trip (automatic or manual). Emergency operating procedures would direct event mitigation efforts which may include isolation of the affected RCS loop. The proposed License Condition will allow use of this mitigation strategy, while prohibiting isolated RCS loop operation in Mode 3 or 4 during normal operation.

There are no regulatory commitments contained within this letter.

If you should have any questions on the above, please contact Mr. Ravi Joshi at (860) 440-2080.

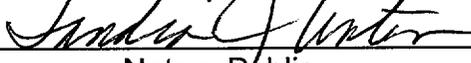
Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

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

Sworn to and subscribed before me

this 13<sup>th</sup> day of November, 2001

  
\_\_\_\_\_  
Notary Public

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

My Commission expires \_\_\_\_\_

cc: H. J. Miller, Region I Administrator  
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3  
NRC Senior Resident Inspector, Millstone Unit No. 3

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