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Millstone Power Station
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Dominion™

JAN 29 2002

Docket No. 50-336
B18567

RE: Generic Letter 87-02
and USI A-46

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

Millstone Nuclear Power Station, Unit No. 2
Completion of The Outstanding Issues Associated With
USI A-46 Program Implementation (TAC No. M69459)

This letter informs the Nuclear Regulatory Commission (NRC) that the closure actions associated with USI A-46 program implementation at Millstone Nuclear Power Station, Unit No. 2 have been completed.

The NRC plant-specific Safety Evaluation Report (SER)⁽¹⁾ for the Unresolved Safety Issue A-46 implementation program at Millstone Unit No. 2 called for submitting responses confirming the closure of the planned actions related to the outliers in Northeast Nuclear Energy Company (NNECO) letter dated October 9, 1998.⁽²⁾ In addition, the NRC's SER identified components in the intake structure with a fundamental natural frequency in the range of 8 to 9 Hz as outliers that should be dispositioned as part of the outlier resolution. The NRC's SER also requested that Millstone Unit No. 2 verify that the seismic margin assessment methodology was not used for resolution of the outliers. This letter provides the required responses.

The following is a list of the outliers and the associated closure action completion statements:

1. Section 2.4.3 of the SER, dated June 30, 1999, on Equipment Anchorages, identified that the NNECO letter of October 9, 1998, has committed to informing the

⁽¹⁾ Plant Specific Safety Evaluation Report for USI A-46 Program Implementation at MP2, Unit No. 2 (TAC No. M69459), dated June 30, 1999.

⁽²⁾ M. L. Bowling to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Identification of The Resolution for Unresolved USI A-46 Mechanical, Electrical and Structural Outliers," dated October 9, 1998.

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NRC of the completion of all identified corrective actions. A review of the tables attached to the October 9, 1998, letter identified the following closure actions as being in-progress at that time. The following describes their present status:

- The modification associated with the cable raceway supports in the cable spreading room was completed, and the modification package was closed prior to re-start from the Mid cycle 13 outage. Therefore, the closure action for this outlier is complete.
 - The modification associated with the relocation of the six GE-IJD relays was completed, and the modification package was closed prior to re-start from the Mid cycle 13 outage. Therefore, the closure action for this outlier is complete.
 - Seismic testing and the re-support of the five contactors, physically located in relays 86/A401 and 86/A312, associated with the GE-HEA relays was completed prior to re-start from the Mid cycle 13 outage. Therefore, the closure action for this outlier is complete.
 - AOP 2562 was revised to incorporate operator resetting from the control room of the GE-HGA and HFA relays, associated with the affected components after the earthquake. The procedure was revised and made effective on July 6, 1999. Therefore, the closure action for this outlier is complete.
2. The NRC's SER dated June 30, 1999, identified a restriction on the use of Generic Implementation Procedure (GIP) Method A.1 for the intake structure components with a fundamental natural frequency in the range of 8 to 9 Hz. NNECO provided additional data in a letter dated October 25, 1999.⁽³⁾ In response, the NRC issued a supplemental SER⁽⁴⁾ dated July 19, 2000. In this supplemental SER the NRC staff stated, "The NRC staff has reviewed this information and determined that GIP-2 Method A.1 is considered reasonable for evaluating seismic adequacy of equipment in the Millstone 2 intake structure for the resolution of USI A-46. Therefore, components located in the intake structure for which method A.1 was used are no longer required to be considered as outliers." No further resolution is required for the actions requested in section 3.0 of the original NRC SER dated June 30, 1999. Therefore, the closure action for this issue is complete.

⁽³⁾ R. P. Necci to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Response to Plant Specific Safety Evaluation Report For USI A-46 Program Implementation (TAC No. M69459)," dated October 25, 1999.

⁽⁴⁾ J. I. Zimmerman, U.S. Nuclear Regulatory Commission to S. E. Scace, "Millstone Nuclear Power Station, Unit No. 2 - Supplemental Safety Evaluation For Unresolved Safety Issue (USI) A-46 Program Implementation (TAC No. M69459)," dated July 19, 2000.

3. The SER dated June 30, 1999, requested that Millstone Unit No. 2 verify that the seismic margin assessment methodology was not used for resolution of outliers. NNECO letter dated October 9, 1998, summarized the methods used for resolving all identified outliers. As can be seen from this letter, the seismic margin assessment methodology was not used to resolve any of the outliers at Millstone Unit No. 2. This provides the verification required by the NRC. Therefore, the closure action for this issue is complete.

Dominion Nuclear Connecticut, Inc. (DNC) expanded the Millstone Unit No. 2 seismic licensing and design basis by adding the seismic verification using the GIP methodology (with the SER imposed limitations) for new and replacement equipment as an alternate method of equipment seismic evaluation. This activity has been implemented as a change in the facility Updated Final Safety Analysis Report.

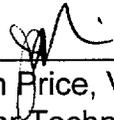
This letter confirms the completion of the USA A-46 closure actions and fulfills the GIP-2, Part I, Section 2.2.8 requirement which states that "each licensee will also provide a completion letter advising the NRC that any corrective actions identified in the summary report or agreed to with the Staff as a result of other related correspondence have been completed."

There are no regulatory commitments contained within this letter.

Should you have any questions on the above, please contact Mr. David W. Dodson at (860) 447-1791 Ext. 2346.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.



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

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