

June 7, 2002

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

FROM: Victor Nerses, Sr. Project Manager */RA/*
Project Directorate I, Section 2
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT 3, FACSIMILE
TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION
(RAI) TO BE DISCUSSED IN AN UPCOMING CONFERENCE CALL
(TAC NO. MA3125)

The attached draft RAI was transmitted by facsimile on June 7, 2002, to Mr. Ravi Joshi of Dominion Nuclear Connecticut, Inc. (DNC). This draft RAI was transmitted to facilitate an upcoming conference call in order to clarify the licensee's application dated October 1, 2001, regarding emergency diesel generator allowed outage time. Review of the RAI would allow DNC to determine and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-423

Enclosure: Draft Request for Additional Information

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DRAFT

REQUEST ADDITIONAL INFORMATION

Concerning the Millstone Unit 3 License Amendment Request (LAR) for a Permanent Technical Specifications (TS) Modification to Extend Allowed Outage Times (AOTs) of the Limiting Condition for Operation (LCO) 3.8.1

1. In the licensee's response to Question 3 (b), reference is made to both 1) Attachment 1, Sheet 4 of work Management Procedure MP-20-WM-FAP02.1, "Conduct of On-Line Maintenance," and 2) Attachment 8 (MP-20-WM-FAP02.1). In order for the color code action levels presented in Attachment 1 and the color code risk matrix presented in Attachment 8 to provide meaningful information, the risk range associated with each color has to be provided. Specifically, the licensee is to provide for each color the range in instantaneous CDF associated with removing equipment from service
2. In addition, since the matrix used at Millstone 3 incorporates both the risk rate and accumulated risk and, hence, is potentially more meaningful than those typically used to manage risk, we need specific definitions of SCT and ACT (mathematical definitions, since they are calculated for each configuration and apply to multiple components simultaneously out of service) with some discussion of what they are intended to convey, in order to understand how the licensee intends to manage the risk associated with the proposed AOT extension using Attachments 1 and 8.
3. In its LAR, the licensee states that since the corrective action plan has not been implemented with regard to the WOG peer review (Sept. 1999), the findings were reviewed to identify those specifically applicable to the proposed EDG AOT extension and four sensitivity studies were initiated as compensation. In response to RAI Question 5, the licensee provided information from the peer review report on Objective and Approach, Scope, Process, Peer Review Grades, and Peer Review Team, as well as summary sheets on each of the eleven technical elements reviewed. Seven of the eleven elements (Containment Performance Analysis, Maintenance and Update Process, Accident Sequence Evaluation, Human Reliability Analysis, Dependency Analysis, Structural Response, and Quantification) were judged to be not adequate to support regulatory applications. The questions then are "What peer review findings prompted the sensitivity studies?" and "How do these studies compensate for the identified short comings (in the above seven technical elements) identified by the peer review?"
4. According to the licensee, the LAR is supported by a PRA evaluation which utilized RG 1.177. The RG identifies a three-tiered approach. Tier 2 of the approach is to identify potentially high-risk configurations that could exist if equipment in addition to that associated with the change were to be taken out of service simultaneously, or other risk-significant operational factors such as concurrent system or equipment testing were also to take place. The objective of this part of the evaluation is to ensure that appropriate restrictions on dominant risk-significant configurations associated with the change are in place. Although the licensee identifies 7 actions that are to be taken to minimize risk and claims that its CRMP provides assurances that high-risk configurations are precluded, high-risk configurations and appropriate restrictions were not identified. In response to Question 3 (a) the licensee begins to address Question 3 (b) by providing a list of risk significant equipment that is routinely removed from service for preventative maintenance during plant operation, instead of identifying high-risk configurations that are not to be entered during an EDG LCO AOT and saying what measures will be taken to ensure that the configurations do not occur. The CRMP, described by MP-20-WM-FAP02.1, does not contain a check list of identified equipment and appropriated restrictions, which is what we expect. Tier 2 is intended to show that the licensee has made an in-depth assessment of risks associated with the proposed TS change before planning maintenance, preventative or corrective.