

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



Dominion

MAY 29 2002

Docket No. 50-336
B18666

RE: 10 CFR 50.90

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

Millstone Nuclear Power Station, Unit No. 2
Administrative Error Associated with TSCR 2-2-01 and License Amendment No. 266

In a letter dated June 4, 2001,⁽¹⁾ Dominion Nuclear Connecticut, Inc. (DNC) submitted a License Amendment Request to the Nuclear Regulatory Commission (NRC) which consisted of the proposed relocation of Millstone Unit No. 2 and Millstone Unit No. 3 Technical Specifications relating to the Reactor Coolant System from each facility's Technical Specifications to their respective Technical Requirements Manuals (TRM).

One of the proposed changes for Millstone Unit No. 2 described within the June 4, 2001, DNC submittal consisted of the relocation of Technical Specification 3.4.11, "Reactor Coolant System Vents" to the facility TRM. This technical specification requires the submittal of a special report to the NRC if the conditions of the associated action statement cannot be met. Technical Specification 6.9.2, "Special Reports," contains an administrative reference (Technical Specification 6.9.2.m) to the special report identified within the action statements for Technical Specification 3.4.11.

Consistent with the proposed relocation of Technical Specification 3.4.11, deletion of Technical Specification 6.9.2.m was discussed within the June 4, 2001, DNC submittal. However, marked up and retyped pages showing the deletion of Technical Specification 6.9.2.m were inadvertently omitted from the June 4, 2001, DNC submittal.

In a letter dated May 8, 2002,⁽²⁾ the NRC issued License Amendment No. 266 for Millstone Unit No. 2. This license amendment approved the proposed changes identified

⁽¹⁾ Raymond P. Necci letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 2 and 3, Technical Specifications Change Requests 2-2-01 and 3-2-01, Relocation of Selected Technical Specifications Related to the Reactor Coolant System," dated June 4, 2001.

⁽²⁾ Victor Nerses to J. A. Price, "Millstone Nuclear Power Station, Unit No. 2 and 3 - Issuance of Amendments Re: Relocating Various Reactor Coolant System Technical Specifications to the Respective Unit's Technical Requirements Manual (TAC Nos. MB2273 and MB2240)," dated May 8, 2002.

A-001

in the June 4, 2001, DNC submittal, including the deletion of the Technical Specification 6.9.2.m. Since the NRC Safety Evaluation Report for License Amendment No. 266 describes the proposed change to delete Technical Specification 6.9.2.m as an acceptable change, DNC considers this omission to be an administrative error which does not require additional NRC review. DNC regrets any inconvenience this error may have caused.

Attachment 1 provides the marked up version of the appropriate page of the current Technical Specifications associated with the deletion of Technical Specification 6.9.2.m. Attachment 2 provides the retyped page for this Technical Specification.

DNC requests that the NRC issue a correction to Millstone Unit No. 2 License Amendment No. 266 which includes the proposed change discussed herein. DNC requests that this correction be issued by June 15, 2002, to support the implementation period described within Millstone Unit No. 2 License Amendment No. 266.

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.



J. Alan Price
Site Vice President - Millstone

Sworn to and subscribed before me

this 29th day of May, 2002

Lorrie A. Arzamarski
Notary Public

My Commission expires 2/28/06

Attachments (2)

cc: See next page

Lorrie A. Arzamarski
Notary Public
Commission Expires
February 28, 2006

U.S. Nuclear Regulatory Commission
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cc: H. J. Miller, Region I Administrator
V. Nerses, NRC Project Manager, Millstone Unit No. 3
R. B. Ennis, NRC Senior 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 Nuclear Power Station, Unit No. 2
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Marked Up Pages

REACTOR COOLANT SYSTEM VENTS

LIMITING CONDITION FOR OPERATION

3.4.11 At least one reactor coolant system vent path consisting of at least two valves in series capable of being powered from emergency buses shall be OPERABLE and closed at each of the following locations:

- a. Reactor Vessel head
- b. Pressurizer steam space

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the Pressurizer vent path inoperable, STARTUP and/or POWER OPERATION may continue provided that i) the inoperable vent path is maintained closed with power removed from the valve actuator of all the valves in the inoperable vent path and ii) one power operated relief valve (PORV) and its associated block valve is OPERABLE; otherwise, restore either the inoperable vent path or one PORV and its associated block valve to OPERABLE status within 30 days, or submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the path to OPERABLE status.
- b. With the Reactor Vessel Head vent path inoperable, STARTUP and/or POWER OPERATION may continue provided that the inoperable vent path is maintained closed with power removed from the valve actuator of all the valves in the inoperable vent path; restore the Reactor Vessel Head vent path to OPERABLE status within 30 days or submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the path to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.4.11 Each reactor coolant system vent path shall be demonstrated OPERABLE at least once per 18 months by:

- 1. Verifying all manual isolation valves in each vent path are locked in the open position.
- 2. Cycling each valve in the vent path through at least one complete cycle of full travel from the control room during COLD SHUTDOWN or REFUELING.
- 3. Verifying flow through the reactor coolant vent system vent paths during COLD SHUTDOWN or REFUELING.

CORE OPERATING LIMITS REPORT (CONT.) For Information Only

- 8) XN-NF-78-44(NP)(A), "A Generic Analysis of the Control rod Ejection Transient for Pressurized water reactors," Exxon Nuclear Company.
 - 9) XN-NF-621(P)(A), "Exxon Nuclear DNB Correlation for PWR Fuel Designs," Exxon Nuclear Company.
 - 10) XN-NF-82-06(P)(A) and Supplements 2, 4, and 5, "Qualification of Exxon Nuclear Fuel for Extended Burnup," Exxon Nuclear Company.
 - 11) ANF-88-133(P)(A) and Supplement 1, "Qualification of Advanced Nuclear Fuels PWR Design Methodology for Rod Burnups of 62 GWd/MTU," Advanced Nuclear Fuels Corporation.
 - 12) XN-NF-85-92(P)(A), "Exxon Nuclear Uranium Dioxide/Gadolinia Irradiation Examination and Thermal Conductivity Results," Exxon Nuclear Company.
 - 13) ANF-89-151(P)(A), "ANF-RELAP Methodology for Pressurized Water Reactors: Analysis of Non-LOCA Chapter 15 Events," Advanced Nuclear Fuels Corporation.
 - 14) EMF-1961(P)(A), "Statistical Setpoint/Transient Methodology for Combustion Engineering Type Reactors," Siemens Power Corporation.
 - 15) EMF-2310(P)(A), "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors," Framatome ANP.
- c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- d. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

- 6.9.2 Special reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator, Region I, and one copy to the NRC Resident Inspector within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:
- a. Deleted

ADMINISTRATIVE CONTROLS

SPECIAL REPORTS (CONT.)

- b. Deleted
- c. Deleted
- d. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- e. Deleted
- f. Deleted
- g. RCS Overpressure Mitigation, Specification 3.4.9.3.
- h. Deleted
- i. Degradation of containment structure, Specification 4.6.1.6.4.
- j. Steam Generator Tube Inspection, Specification 4.4.5.1.5.
- k. Accident Monitoring Instrumentation, Specification 3.3.3.8.
- l. Radiation Monitoring Instrumentation, Specification 3.3.3.1.
- m. Reactor ~~Coolant System Vents~~, Specification 3.4.11. *Replace with "Deleted"*

6.10 Deleted.

Attachment 2

Millstone Nuclear Power Station, Unit No. 2
Administrative Error Associated with TSCR 2-2-01 and License Amendment No. 266
Retyped Page

ADMINISTRATIVE CONTROLS

SPECIAL REPORTS (CONT.)

- b. Deleted
- c. Deleted
- d. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- e. Deleted
- f. Deleted
- g. RCS Overpressure Mitigation, Specification 3.4.9.3.
- h. Deleted
- i. Degradation of containment structure, Specification 4.6.1.6.4.
- j. Steam Generator Tube Inspection, Specification 4.4.5.1.5.
- k. Accident Monitoring Instrumentation, Specification 3.3.3.8.
- l. Radiation Monitoring Instrumentation, Specification 3.3.3.1.
- m. Deleted

6.10 Deleted.