

July 17, 2002

LICENSEE : Dominion Nuclear Connecticut (DNC)

FACILITIES: Millstone Units 2 and 3

SUBJECT: SUMMARY OF MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION (NRC) STAFF AND DNC REGARDING THE PLAN FOR FUTURE MILLSTONE UNITS 2 AND 3 LICENSE RENEWAL APPLICATION

On June 19, 2002, the NRC staff held a public meeting with DNC to discuss their plans to submit a license renewal application for Millstone Units 2 and 3 in 2004. The list of meeting attendees is provided in Enclosure 1. The meeting agenda and NRC guidance for electronic formatting of license renewal applications are provided in Enclosure 2. The slides for the presentation given by DNC are provided in Enclosure 3. A copy of all the handouts for this meeting was placed in the NRC's public document room on June 19, 2002.

The presentation by DNC included a summary description of how they intended to format their future license renewal application (LRA), a summary explanation of why they believe their impending exemption request (from the requirements of 10 CFR 54.17(c)) for Unit 3 should be approved, and a schedule for future activities. The staff asked clarifying questions about the proposed LRA format and the proposed exemption request.

Following the presentation given by DNC, members of the public were provided an opportunity to ask questions of the staff. A representative from the Connecticut Coalition Against Millstone requested to speak. The representative stated that her organization was opposed to license renewal for the Millstone units. The representative questioned the company's ability to comply with the license renewal standards and recommended that the company phase out nuclear plants in Connecticut in light of dangers more evident after September 11, 2001. The representative expressed concern that aircraft were flying near the plant; the plant should be made less vulnerable to terrorist attacks; there was an increased incidence of certain cancers in the area surrounding the plants; and that the company should conduct a health survey. The representative made additional statements about plant component aging; previous performance problems with Unit 2; the lack of commonality between the two units to support an exemption request; the company's limited experience in Connecticut; how the company's experience with the Virginia nuclear plants did not translate to the Connecticut plants; the loss of experienced staff at Millstone; the decrease of space for spent fuel at Unit 2; not renewing the license until there is an offsite location to move the fuel to; and the missing fuel rod at Unit 1.

The NRC staff provided an overview of the license renewal process, specifically pointing out that it provided an opportunity for public involvement. The staff added that, since DNC had not submitted a license renewal application, the opportunity for public participation would be in the future, when and if, DNC submitted an LRA. The staff pointed out that the NRC external web page (www.nrc.gov) provided more detailed information on the license renewal process. The staff also explained that any specific concerns related to plant security and health and safety

should be addressed today and brought to the attention of the NRC project manager for the Millstone units, rather than wait until an LRA is submitted.

/RA/

David L. Solorio, Senior Reactor Systems Engineer
License Renewal Section
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket Nos.: 50-336 and 50-423

Enclosures: As stated

cc w/enclosures: See next page

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DATE	7/16/02	7/16/02	7/17/02

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DISTRIBUTION: Meeting Summary with DNC, Dated: July 17, 2002

HARD COPY

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**Millstone Nuclear Power Station
Units 2 and 3**

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Millstone Nuclear Power Station

Units 2 and 3

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NRC Meeting Attendance List, (June 19, 2002)
Interim Staff Guidance Process

<u>Name (print)</u>	<u>Organization</u>
1. David L. Solorio	NRC/NRR/DRIP/RLEP
2. Steve Hoffman	NRC/NRR/DRIP/RLEP
3. P.T. Kuo	NRC/NRR/DRIP/RLEP
4. William Burton	NRC/NRR/DRIP/RLEP
5. Joe Besade	CT Coalition Against Millstone
6. Stuart Thickman	Dominion Nuclear CT
7. David W. Dodson	Dominion Nuclear CT
8. William B. Watson	Dominion Nuclear CT
9. Diane Aitken	Dominion Nuclear CT
10. Paul Aitken	Dominion Nuclear CT
11. Jerry Phillabaum	Exelon Nuclear
12. Gregory Twacetman	McGraw & Hill
13. Ralph Bunge	Waterford, Conn.
14. Kimberley Rico	NRC/NRR/DRIP/RLEP
15. Winston Liu	NRC/NRR/DRIP/RLEP
16. Stewart Baley	EMEB
17. Cliff Munson	NRC/NRR/DE/EMEB
18. David Cullison	NRC/NRR/DSA/SPLB
19. Greg S. Galletti	NRC/NRR/DIPM/IEHR
20. Goutam Bagchi	NRC/NRR/DE
21. Chang-Yang Li	NRC/NRR/DSSA/SPLB
22. Barry Elliot	NRC/NRR/DE/EMCB
23. Rick Ennis	NRC/NRR/DLPM
24. Steve Jones	NRC/NRR/DSSA/SPLB
25. Bob Weisman	NRC/OGC
26. Nancy Burton	CT Coalition Against Millstone

MEETING BETWEEN THE NRC AND DOMINION NUCLEAR CONNECTICUT
REGARDING THE FUTURE LICENSE RENEWAL APPLICATION FOR MILLSTONE UNITS
2/3
ROCKVILLE, MARYLAND
ROOM O-10B4
JUNE 19, 2002

- AGENDA -

- | | | |
|------|--|------------------|
| I. | Introduction - NRC | 9:00-9:05 a.m. |
| II. | Introduction - the Dominion Millstone Team | 9:05-9:10 a.m. |
| III. | Review of the License Application Format | 9:10-9:40 a.m. |
| IV. | Review of the Millstone Unit 3 Exemption Logic | 9:40-10:10 a.m. |
| V. | Questions from Public | 10:10-10:35 a.m. |
| VI. | Follow-up Action Review & Closing Remarks | 10:35-10:55 a.m. |

OCIO Instructions to ensure CDs are web compatible
(*License Renewal Preferences are Italicized*)

7. The CD should be cleanly formatted. The use of executables and index files to improve stand-alone CD capabilities should be minimized to facilitate adaptation to the web. Additional directories or files (such as those that Adobe places on the CD with executables or sample files) should be clearly identified and will not be posted to the web.
 - a. *No auto-run on CD for Web*
 - b. *Suggested PDFs broken down as application, environmental report, and groupings of environmental report appendices (to help stay within the 5MB range)*
 - c. *Bookmarks also cleanly formatted and include both the section number and title*
8. Typical file size should not exceed 5 MB to improve availability of the files. For those in excess of 5 MB, OCIO will determine whether the NRC would need to divide the files into smaller components prior to posting on the web. (*To help keep file sizes down, try not to include extraneous pictures that do not add value to the application. Also see No.8 below concerning graphics.*)
9. If the CD includes more than one PDF file, and the files need to be linked together, the following requirements apply:
 - a. The links within the PDF files must be formatted as standard html links, not generated using the Acrobat catalog feature, which generates proprietary links that will not work with a non-Adobe Webserver. There should be limited PDF index files (only as needed to support stand-alone functionality) on the CD.
 - b. The file names, directory names, and corresponding links on the CD must not include the space character (ASCII code 32) or other characters beyond the alphanumeric portion of the ASCII character set. Underscores (ASCII 95) and hyphens (ASCII 45) are permitted.
 - c. Filename nomenclature is to use lowercase for all alphabetical characters in file names and directory names.
(*Links in documents and bookmarks are fine as long as you follow these three guidelines above, otherwise the links will be deleted from the PDFs for the web.*)
10. The files on the CD should not be locked or password protected in any way.
11. The files should be saved in Acrobat 3.0-compatible format (an option in Acrobat 4.0). (*The NRC is currently using Acrobat 5.0.*)
12. The embedded font option should be set to 100% - - all fonts should be stored in the file.
13. Be sure to optimize the PDF in Acrobat application if you make changes in Acrobat after the initial PDF is created. This will ensure that old information is removed and the file is as small as possible.

14. Graphic compression depends on intended purpose. If you set the pixel resolution for print quality (usually about 300 dpi), the file can get quite large if it has many graphics. As an alternative, set the sampling to 72 dpi, which will appear OK on a PC monitor but may not print as cleanly.



Millstone Power Station License Renewal Application

Rockville, Maryland
June 19, 2002



Millstone License Renewal Application

Topics

- License Renewal Application
- 10 CFR 54.17(c) Exemption Request
- Schedule

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Millstone License Renewal Application

Participants

- Dominion LR Personnel
 - Lucky Wroniewicz - Manager, Licensing Projects
 - Bill Watson - LRA Supervisor
 - Paul Aitken - IPA Supervisor
 - Dave Dodson - Nuclear Engineering - Licensing
 - Stu Thickman - Lead LRA Engineer
 - Diane Aitken - LRA Engineer

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Millstone License Renewal Application

License Renewal Application

- Unit 2 and Unit 3 LRAs will be filed concurrently (NRC approval of exemption required)
- Electronic Submittal (Adobe® Portable Document Format on CD-ROM)
- Format consistent with NEI 95-10 and NUREG-1800
- GALL report (NUREG-1801) will be utilized
- Maintain industry involvement on evolving LRA format and content discussions

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Millstone License Renewal Application

License Renewal Application

- **Contents**
 - 1.0 Administrative Information
 - 2.0 Scoping and Screening Methodology for Identifying Structures and Components Subject to Aging
 - 3.0 Aging Management Review Results
 - 4.0 Time-Limited Aging Analyses
 - App. A FSAR Supplement
 - App. B Aging Management Activities
 - App. C AMR Methodology
 - App. D Technical Specification Changes
 - App. E Environmental Report

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Millstone License Renewal Application

License Renewal Application

Section 2.0 - Screening Results Tables

- **Tables include:**
 - Reference to Section 3 AMR Results Table for each Component/Structure

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License Renewal Application

Section 3.0 - AMR Results Tables

- **Table from SRP with plant-specific discussion column that relate to our evaluations against the GALL**
- **One or more additional tables with plant-specific results for material, environment, aging effects, and aging management activities that are not included in the GALL**



License Renewal Application

Sample:
Table excerpts
showing links
and content

Table 2.3.3-1 Chemical and Volume Control (CV) System

Component Group	Function	Aging Management Review Results
Pump Casings	Pressure boundary	Table 3.3.1, Item 8 Table 3.3.1-1, Item 4

Table 3.3-1. Summary of Aging Management Programs for Auxiliary Systems Evaluated in Chapter VII of the GALL Report

Item	Component	Aging Effect/ Mechanism	Aging Management Programs	Further Evaluation Recommended	Discussion
8	Heat exchangers in reactor/water cleanup system (BWR); high pressure pumps in chemical and volume control system (PWR)	Crack initiation and growth due to SCC or crevicing	Plant specific	Yes, plant specific (see subsection 3.3.2.2.4)	1. MP52 aging management review results are consistent with NUREG-1801. 2. The Primary Chemistry Program (B.2.4) manages this aging effect.

Table 3.3.1-1. Summary of Aging Management Results for Auxiliary Systems Not Included in NUREG-1801

Item	Component Group	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
4	Pump Casings	Stainless Steel	Treated Water	Loss of material	Primary Chemistry Program (B.2.4)

License Renewal Application

Appendix C

- Description of the AMR Methodology
- Discussion of the relationship between aging mechanisms and effects

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License Renewal Application

LRA Electronic Submittal

- Provide hypertext links throughout the document to facilitate navigating the application
- Provide bookmarks at sub-section level
- Provide fully indexed and searchable file to quickly locate desired information
- Provide hypertext links to LR drawings and referenced FSAR sections (drawings and FSAR provided for reference on submittal CD)

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License Renewal Application

Exemption Request

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Exemption Request

- 10 CFR 54.17(c) requires 20 years operating experience prior to submitting an application for a renewed license.
- By submittal date, January 2004:
 - Millstone Unit 2 - 29 years Operating Experience
 - Millstone Unit 3 - 18.25 years Operating Experience
- Exemption to the 20-year requirement is required for Unit 3 to allow filing of concurrent LRAs.

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Exemption Request

- Per 10 CFR 50.12, exemption to schedular requirements of 10 CFR 54.17(c) is allowed if application of the regulation is not necessary to achieve the underlying purpose of the rule.
- Underlying purpose of 10 CFR 54.17(c) is to ensure that an applicant's plant has accumulated sufficient operating experience to assess age-related degradation of plant Structures, Systems, or Components.

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Exemption Request

- Both Millstone Units 2 and 3 are similar in materials of construction and operating environments.
- With similar materials and environments, aging-related operating experience at Unit 2 is applicable to Unit 3.

14

Exemption Request

- Surry and North Anna Power Stations have the same NSSS and A/E as Millstone Unit 3.
- Similarities between Units 2 and 3, as well as Dominion experience with operation of Surry and North Anna, provides significant operating experience base for evaluation of aging effects for Millstone Unit 3.

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Exemption Request

- Unit similarities, and substantial operating time for Dominion plants sufficiently compensates for operating time (1.75 years) remaining for Unit 3 to meet the letter of the rule.

16

Exemption Request

- This plant experience base demonstrates compliance with regulatory intent in achieving the underlying purpose of the rule.

17

Exemption Request

NRC resources would be more effectively utilized from efficiencies gained from reviewing concurrent applications:

- IPA methodologies and many of the programs will be common to both units.
- Only one Supplementary Environmental Impact Statement (instead of two).
- Only one series of public environmental scoping meetings (instead of two).

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Schedule

- Letter of Intent submitted March 5, 2002
- Exemption Request scheduled to be submitted third quarter 2002.
- Technical activities [IPA] presently scheduled for completion by second quarter 2003
- Internal reviews and approvals of License Renewal Application scheduled for completion by fourth quarter 2003.
- License Renewal Applications scheduled to be submitted first quarter 2004.

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