November 8, 2002

Mr. J. A. Price
Site Vice President - Millstone
Dominion Nuclear Connecticut, Inc.
c/o Mr. David A. Smith
Rope Ferry Road
Waterford, CT 06385

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, LIMITING SAFETY SYSTEM SETTINGS AND INSTRUMENTATION, MILLSTONE POWER STATION, UNIT NO. 2 (TAC NO. MB5008)

Dear Mr. Price:

By letter dated May 7, 2002, you submitted a proposed amendment to the Technical Specifications (TSs) for Millstone Power Station, Unit No. 2. The proposed amendment would change TSs 2.2, "Limiting Safety System Settings," and 3/4.3, "Instrumentation," to more accurately reflect the existing plant design for the Reactor Protection System, the Engineered Safety Features Actuation System, and the Radiation Monitoring System instrumentation and to provide consistency within TS Tables 2.2-1, 3.3-1, and 4.3-1.

The U.S. Nuclear Regulatory Commission staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure. We request that the additional information be provided within 30 days of receipt of this letter. The 30-day response timeframe was discussed with Mr. Ravi Joshi of your staff on November 6, 2002. If circumstances result in the need to revise your response date, or if you have any questions, please contact me at (301) 415-1420.

Sincerely,

/RA/

Richard B. Ennis, Senior Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosure: Request for Additional Information

cc w/encl: See next page

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Millstone Power Station
Unit 2

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REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS

LIMITING SAFETY SYSTEM SETTINGS AND INSTRUMENTATION

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

By letter dated May 7, 2002, Dominion Nuclear Connecticut, Inc. (DNC or the licensee), submitted a proposed amendment to the Technical Specifications (TSs) for Millstone Power Station, Unit No. 2 (MP2). The proposed amendment would change TSs 2.2, “Limiting Safety System Settings,” and 3/4.3, “Instrumentation,” to more accurately reflect the existing plant design for the Reactor Protection System (RPS), the Engineered Safety Features Actuation System (ESFAS), and the Radiation Monitoring System instrumentation and to provide consistency within TS Tables 2.2-1, 3.3-1, and 4.3-1.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed TS changes. In order for the staff to complete its evaluation, additional information is requested. The "TS Change No." referenced in each of the following questions corresponds with the change number as designated in Attachment 1 of DNC's submittal dated May 7, 2002.

1) TS Change Nos. 1, 5, and 10

The proposed changes would delete the current TS requirements associated with the Reactor Coolant Pump (RCP) underspeed trip. Although the underspeed trip is not credited in the accident analyses (reference Final Safety Analysis Report (FSAR) Section 14.3.1.6), FSAR Section 7.2.3.3.1 states that the trip initiation ensures rapid protection of the core against Departure from Nucleate Boiling (DNB) when there is a loss of two or more RCPs. As indicated by a letter to the NRC from the then-licensee (Northeast Utilities) dated November 8, 1978, an NRC meeting summary dated January 3, 1979 (for a meeting held on November 21, 1978), MP2 Amendment No. 52 dated May 12, 1979, and Licensee Event Report 99-006-00 dated March 30, 1999, the addition of the RCP underspeed TS trip function was part of the changes deemed necessary to justify an increase in the MP2 licensed maximum power level from 2560 MWt to 2700 MWt.

Since the addition of the TSs associated with the RCP underspeed trip (In Amendment No. 52) was part of the basis for the current licensed maximum power level, provide justification for deleting the current TSs with respect to the requirements of 10 CFR 50.36(b) which states:

“Each license authorizing operation of a production or utilization facility of a type described in §50.21 or §50.22 will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to §50.34. The Commission may include such additional technical specifications as the Commission finds appropriate.” (*emphasis added)*

ENCLOSURE

The justification should include discussion of why safe operation of the facility will not be adversely impacted and address how the TSs that are retained will continue to provide appropriate limits and remedial measures sufficient to ensure adequate protection is maintained.

2) TS Change No. 2

Provide information regarding the operation of the “Wide Range Logarithmic Neutron Flux Monitor - Shutdown” functional unit with respect to its RPS trip function in order to explain why it does not have a trip setpoint or allowable value per the proposed changes to TS 2.2.1, Table 2.2-1.

3) TS Change Nos. 6 and 7

The proposed revision to TS 3.3.1.1, Table 3.3-1 to include new functional units, Item 13 (RPS Logic Matrices) and Item 14 (RPS Logic Matrix Relays) is not consistent with Standard Technical Specification (STS) NUREG-0212 as stated in the application or with STS NUREG-1432. The staff notes that NUREG-1432 is the acceptable model TSs for Combustion Engineering (CE) plants (analog and digital instrumentation designs). The staff will accept the NUREG-1432 model TSs for MP2 with an appropriate justification for deviations from the STS requirements based on the MP2 design and on an established safety basis for operation under new requirements that result from the proposed changes. Therefore, provide a safety analysis discussion for proposed Items 13 and 14 in TS Table 3.3-1 with respect to Limiting Condition for Operation (LCO) operability requirements, applicability requirements, and the action requirement limits including the 48-hour repair allowed outage time (AOT) and the channel bypass allowance for surveillance testing. Show that the proposed TSs provide appropriate operational limits and are consistent with the accepted MP2 design basis and the precedents for the TSs as provided by NUREG-1432.

4) TS Change No. 8

NUREG-0212 used “channels” requirements in Table 3.3-1 and the action requirement allowance includes a 1-hour channel bypass for surveillance testing, but the functional units in the NUREG TSs apply to digital instrumentation CE plant design. NUREG-1432 TSs for analog plants do permit a 1-hour surveillance test bypass. Provide discussion for Item 15 (Reactor Trip Breakers), TS Table 3.3-1 with respect to LCO operability requirements, applicability requirements, and the action requirement limits including the channel bypass allowance for surveillance testing. Show that the proposed TS provides appropriate operational limits and is consistent with the accepted MP2 design basis.

5) TS Change No. 11

Similar to the discussion in Question 3 for TS Changes 6 and 7, the proposed changes to TS 3.3.1.1, Table 4.3-1, Items 13 and 14, are not consistent with NUREG-0212 (i.e., NUREG-0212 does not show the RPS Logic as consisting of matrices and matrix relays). NUREG-1432 is the acceptable model TS for CE plants (analog and digital instrumentation designs). Compare the MP2 design to NUREG-1432 and justify any surveillance requirement differences, including changes to surveillance applicability changes to include mode "*" (i.e., whenever the reactor trip circuit breakers (RTCBs) are closed).

6) TS Change Nos. 13.a - 13.f, and 13.h

For proposed TS changes 13.a, 13.b, 13.c, 13.d, 13.e, 13.f, and 13.h, with respect to the proposed TS Table 3.3-3, Action 5 requirements, Attachment 1, page 6 of the application states: "The 48 hour completion time is also consistent with the existing technical specification requirements for restoration of an inoperable manual trip channel for the associated ESFAS functional unit." What is the importance of this comparison? Does it relate to the MP2 design or NUREG-1432? Note, if NUREG-1432 contains TS values in [ ] then plant-specific justification is needed for establishing an appropriate safety basis. Provide detailed supporting design information justification for the Action 5 48-hour repair AOT.

In addition, provide detailed supporting justification for TS changes 13.a - 13.f, and 13.h. In general, the discussions of change need to establish a safety basis for operation under new requirements that result from the proposed changes. Justification for deviations from STS requirements should include discussion of the MP2 design.

7) TS Change No. 13.g

For Item 13.g, the staff notes that the proposed TS deviates from NUREG-0212 because the NUREG does not include Automatic Actuation Logic (AAL) for either emergency bus undervoltage protection channel. Provide detailed supporting justification for including emergency bus undervolatge protection channel AAL. Discussions of change need to establish a safety basis for operation under new requirements that result from the proposed changes. Justification for deviations from STS requirements should include discussion of the MP2 design.

8) TS Change No. 17

Provide justification for performing response time testing of the control room isolation function (Table 3.3-6, Item 1.b) on a staggered test basis frequency.

9) TS Change No. 21

The proposed TS Action changes are consistent with NUREG-1432 and are less restrictive than the current TSs; however, the staff notes the proposed surveillance requirements do not include testing to verify each required control circuit and transfer switch is capable of performing its intended safety function. In addition, the proposed TS does not test the RTCB open/close indication. Provide discussion regarding the MP2 design of installed control circuit, transfer switches and remote shutdown RTCB open/close indication. Identify and provide citations for any existing procedures that are used to ensure these components are tested in order for the Table 3.3-9 Instrumentation to be operable.

10) TS Change No. 23

The proposed TS Action repair AOT for inoperable remote shutdown instrument channels is consistent with NUREG-1432. The safety summary discussion states the potential risk increase associated with the proposed extension of the surveillance frequency from 7 days to 31 days is insignificant. Provide supporting documentation for this conclusion.