December 4, 2002

MEMORANDUM TO: James W. Andersen, Acting 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 POWER STATION, UNIT NO. 3, FACSIMILE TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION (RAI) TO BE DISCUSSED IN AN UPCOMING CONFERENCE CALL (TAC NO. MB6166)

The attached draft RAI was transmitted by facsimile on December 4, 2002, to Mr. Dave Dotson, Dominion Nuclear Connecticut, Inc. (DNC). This draft RAI was transmitted to facilitate an upcoming conference call in order to clarify certain items in the licensee's application dated August 7, 2002, regarding limiting safety system settings and instrumentation. 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 FOR ADDITIONAL INFORMATION

MILLSTONE POWER STATION, UNIT NO. 3 (MP3)

(TAC NO. MB6166)

1. Item 5 changes the surveillance requirements for Source Range Neutron Flux to limit surveillance under plant operating modes 3, 4, and 5 to the same conditions under which operability is required. This is consistent with the Westinghouse Owners Group (WOG) Standard Technical Specifications (STS) SR 3.0.1. However, the applicability requirement for this channel is slightly different from the requirement in the STS: The STS requires operability "With Rod Control System capable of rod withdrawal or one or more rods not fully inserted" whereas the existing TS and the proposed surveillance change require operability "When the Reactor Trip System breakers are closed and the Control Rod Drive System is capable of rod withdrawal." The condition regarding Reactor Trip Systems is not limiting because the control system would be precluded from withdrawing a rod anyway if they were open. But the exclusion of the condition regarding full insertion of all rods results in reduced conservativism as compared with the STS. Please resolve or justify this discrepancy with the STS (NUREG1431). Please provide the plant-specific bases for the revised Technical Specification.

2. Item 6 limits surveillance of instrumentation relating to Low Pressurizer Pressure and High Pressurizer Water Level to operation above the MP3 P7 (power) setpoint. This is consistent with the corresponding requirement for pressurizer low pressure function in the WOG STS (Table 3.3.1-1 item 8a), but conflicts with the STS requirement regarding pressurizer high level (Table 3.3.1-1 item 9). The STS requirement for high pressurizer water level is tied to the "Low Power Reactor Trips Block" interlock (STS P7), not to the "Power Range Neutron Flux" interlock (STS P8). In other words, surveillance related to high pressurizer water level is required above the low power level, not just at high power. Whereas the STS address operability and surveillance together in a single table, the existing and proposed TS separate these into Tables 3.x-x and 4.x-x. The proposed modification to Table 4.3-1 for surveillance concerning low pressurizer pressure appears, as indicated above, to be in conflict with the STS. We note that Table 3.3-1of the MP3 Technical Specifications, as it presently exists, exhibits this same apparent conflict with the STS requirement for operability above low power. Please resolve or justify these discrepancies with the STS (NUREG1431). Please provide the plant-specific bases for the revised Technical Specification.

3. Item 7 defines actions to be taken in response to loss of multiple channels of 4kv bus undervoltage instrumentation in order to preclude violation of LCO 3.0.3 under such circumstances. The proposed actions resemble WOG STS 3.3.5 ("Instrumentation - Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation") conditions B and C. Please provide the plant-specific bases for the revised Technical Specification.