December 19, 2002

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

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

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2,
FACSIMILE TRANSMISSION, ISSUES TO BE DISCUSSED IN AN UPCOMING CONFERENCE CALL (TAC NO. MB4273)

The attached information was transmitted by facsimile on December 13, 2002, to Mr. Ravi Joshi of Dominion Nuclear Connecticut, Inc. (the licensee). This information was transmitted to facilitate a upcoming conference call in order to clarify the licensee's amendment request dated February 5, 2002. The proposed amendment would revise the surveillance requirements associated with the Containment Isolation Valves (CIVs), Reactor Building Closed Cooling Water (RBCCW) System, and Service Water (SW) System. The proposed changes would remove redundant testing requirements that are already addressed by the Inservice Testing Program, which is required pursuant to Technical Specification (TS) 4.0.5, and would use TS 4.0.5 to control the specific acceptance criteria and frequency of test performance. Additional proposed changes would remove the post maintenance testing requirements associated with the CIVs, revise the wording of the RBCCW and SW Systems Limiting Conditions for Operation, and increase the allowed outage times for the RBCCW and SW Systems.

This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-336

Attachment: Issues for Discussion in Upcoming Telephone Conference

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ISSUES FOR DISCUSSION IN UPCOMING TELEPHONE CONFERENCE

REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS

CONTAINMENT ISOLATION, REACTOR BUILDING CLOSED COOLING WATER, AND

SERVICE WATER SURVEILLANCE REQUIREMENTS

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO 50-336

By letter dated February 5, 2002, Dominion Nuclear Connecticut, Inc. (the licensee) submitted a proposed amendment to the Technical Specifications (TSs) for Millstone Power Station, Unit No. 2 (MP2). The proposed amendment would revise the surveillance requirements (SRs) associated with the Containment Isolation Valves (CIVs), Reactor Building Closed Cooling Water (RBCCW) System, and Service Water (SW) System. The proposed changes would remove redundant testing requirements that are already addressed by the Inservice Testing (IST) Program, which is required pursuant to Technical Specification (TS) 4.0.5, and would use TS 4.0.5 to control the specific acceptance criteria and frequency of test performance. Additional proposed changes would remove the post maintenance testing requirements associated with the CIVs, revise the wording of the RBCCW and SW Systems Limiting Conditions for Operation, and increase the allowed outage times for the RBCCW and SW Systems.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed TS changes and would like to discuss the following issues to clarify the submittal dated February 5, 2002:

1) Attachment 1 of the submittal, page 5 (item 3), and page 6 (item 7) discuss the proposed deletion of SRs 4.6.3.1.1.a.2 and 4.6.3.1.2.d. The proposed changes would delete the TS requirements for exercising certain manual CIVs through one complete cycle of full travel on a periodic basis. The staff has previously determined that the testing of the manual CIVs can be removed from the SRs but the SRs must retain requirements to verify that the manual CIVs are secured in the safe position. The Improved Standard Technical Specifications (STS), NUREG-1432, Revision 2, “Standard Technical Specifications, Combustion Engineering Plants,” SRs 3.6.3.3 and 3.6.3.4, contains this type of requirement. Justify the exclusion of the manual CIV position verification requirements from your proposed TS revision.

2) The current TSs allow the RBCCW and SW pumps to degrade to 93% of the manufacturer's pump curve flow before they are declared inoperable. The ASME Code allows pumps to degrade to 90% flow capacity or the TS limits. Please provide justification for this relaxation of pump flow testing requirements.

ATTACHMENT