December 31, 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 - CONTAINMENT SYSTEMS, MILLSTONE POWER STATION, UNIT NO. 2 (TAC NO. MB6109)

Dear Mr. Price:

By letter dated August 14, 2002, you submitted a proposed amendment to the Technical Specifications (TSs) for Millstone Power Station, Unit No. 2. The proposed amendment would revise the TSs related to Containment Systems.

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 by February 28, 2003. The response timeframe was discussed with Mr. Ravi Joshi of your staff on December 19, 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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NAME	REnnis	LCox	SWeerakkody	RDennig	JClifford
DATE	12/19/02	12/20/02	11/27/02	12/6/02	12/23/02

OFFICIAL RECORD COPY

Millstone Power Station
Unit 2

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REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS

CONTAINMENT SYSTEMS

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO 50-336

By letter dated August 14, 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 TSs related to Containment Systems.

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 "Proposed Change No." referenced in each of the following questions corresponds with the change number as designated in Attachment 1 of the licensee's submittal dated August 14, 2002.

1) Proposed Change No. 6

The licensee has proposed to add new SR 4.6.1.1.e that would read as follows:

> Verify containment structural integrity in accordance with the Containment Tendon Surveillance Program.

It is suggested that this new SR be revised to read as follows so that the wording is compatible with the lead-in wording of SR 4.6.1.1 (i.e., "Primary CONTAINMENT INTEGRITY shall be demonstrated:"):

> By verifying containment structural integrity in accordance with the Containment Tendon Surveillance Program.

2) Proposed Change No. 8

LCO 3.6.3.1 currently reads as follows:

> Each containment isolation valve shall be OPERABLE.*

The footnote "*" that pertains to the word OPERABLE currently reads as follows:

> Locked or sealed closed valves may be opened on an intermittent basis under administrative controls.

The licensee has proposed to change the format for footnote identifier "*" with the identifier "(1)" and proposes to change the footnote wording to read as follows:

> Containment isolation valves may be opened on an intermittent basis under administrative controls.

As discussed in the TS Bases for TS 3/4.6.3, the containment purge supply and exhaust isolation valves are required to be sealed closed during plant operation, since these valves have not been demonstrated to be capable of closing during a loss-of-coolant accident or steam line break accident. Therefore, the footnote should be modified to reflect that it does not apply to the purge valves. Note, modifying the footnote to exclude the purge valves would provide consistency with the STS, NUREG-1432, Revision 2, TS 3.6.3, Note 1, which reads:

> Penetration flow paths [except for [42] inch purge valve penetration flow paths] may be unisolated intermittently under administrative controls.

In addition, your justification for the proposed change states that there is no reduction in requirements, or changes to operation of CIVs, or to their administrative controls. However, the proposed change expands the scope of which CIVs may be opened intermittently under administrative controls and thus new administrative controls would be required to open the CIVs that are not allowed to be open under the current TS requirements. Please justify this expansion in scope.

3) Proposed Change No. 9

The Action Statement for TS 3.6.3.1 currently reads as follows:

> With one or more of the isolation valve(s) inoperable, either:
>
> a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
>
> b. Isolate the affected penetration(s) within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position(s), or
>
> c. Isolate the affected penetration(s) within 4 hours by use of a closed manual valve(s) or blind flange(s); or
>
> d. Be in COLD SHUTDOWN within the next 36 hours.

The licensee has proposed to change the designation for existing item “d” to “e,” and add a new item “d” that would read as follows:

> d. Isolate the affected penetration that has only one containment isolation valve and a closed system within 72 hours by use of at least one closed and deactivated automatic valve, closed manual valve, or blind flange; or

The licensee's submittal states that the proposed change adds a separate allowed outage time (AOT) to incorporate the changes approved in TSTF-30, which allows an AOT of 72 hours for those penetrations with a single containment isolation valve (CIV) and a closed system. One of the changes in TSTF-30 included a revision to the TS Bases to state that the closed system must meet the requirements of Standard Review Plan (SRP) 6.2.4. Your submittal states that use of the term “closed system” for containment penetrations in MP2 design and licensing basis is not in alignment with, or committed to the requirements of, a “closed system” in the Standard Review Plan 6.2.4. Please provide additional information regarding how the SRP 6.2.4 criteria for a closed system differ from the MP2 design and licensing basis.

In addition, your proposed change to the TS Bases (submittal Attachment 3, Insert "D") states that for the purposes of meeting this LCO, neither the CIV, nor any alternate valve on a closed system has a leakage limit associated with valve operability. As discussed in TS 1.6, a system, subsystem, train, component, or device shall be operable or have operability when it is capable of performing its specified functions. What are the criteria for determining if a CIV on a closed system is operable if it exhibits a high leakage rate? If the acceptance criteria is that the valve meets SR 4.6.3.1.1 (which does not include any leakage criteria), how is the containment isolation function accomplished for a CIV on a closed system with a high leakage rate?

4) Proposed Change No. 10

The licensee has proposed to add a new footnote "(2)" pertaining to LCO 3.6.3.1 that would read as follows:

> The provisions of this Specification are not applicable for main steam isolation valves. However provisions of Specification 3.7.1.5 are applicable for main steam isolation valves.

The proposed change for MP2 is similar to TSTF-44, which proposed to add a note to the containment isolation valve LCO to state that the LCO is not applicable to main steam safety valves, main steam isolation valves, main feedwater isolation valves (MFIVs), MFIV bypass valves, and atmospheric dump valves. The NRC rejected TSTF-44 because the proposed change did not recognize that the separate LCOs related to these valves are associated with their dual safety functions. Please provide justification for the proposed change that addresses all safety functions of the main steam isolation valves.