

Dominion Nuclear Connecticut, Inc.  
Millstone Power Station  
Rope Ferry Road  
Waterford, CT 06385



**Dominion™**

JAN 14 2003

Docket No. 50-336  
B18818

RE: 10 CFR 50.90

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Millstone Power Station, Unit No. 2  
Response to a Request for Additional Information  
License Basis Document Change Request 2-14-01  
Containment Isolation, Reactor Building Closed Cooling Water, and  
Service Water Surveillance Requirements (TAC No. MB4173)

In a letter dated February 5, 2002,<sup>(1)</sup> Dominion Nuclear Connecticut, Inc. (DNC) requested changes to the Millstone Unit No. 2 Technical Specifications. The main purpose of the requested changes was to revise the surveillance requirements associated with the Containment Isolation Valves, Reactor Building Closed Cooling Water System, and Service Water System to remove redundant testing requirements that are already addressed by the Inservice Testing (IST) Program (Technical Specification 4.0.5) and use the IST Program to control the specific acceptance criteria and frequency of test performance. On December 13, 2002,<sup>(2)</sup> a Request for Additional Information (RAI) was received via facsimile from the Nuclear Regulatory Commission which contained two (2) questions related to the aforementioned License Basis Document Change Request.

These two questions were discussed during a conference call conducted on December 18, 2002. Attachment 1 provides the DNC response to these questions. The additional information provided in this letter does not affect the conclusions of the Safety Summary and Significant Hazards Consideration discussion in the DNC letter dated February 5, 2002.

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<sup>(1)</sup> J. A. Price letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, License Basis Document Change Request 2-14-01, Containment Isolation, Reactor Building Closed Cooling Water, and Service Water Surveillance Requirements," dated February 5, 2002.

<sup>(2)</sup> R. B. Ennis (NRC) Facsimile Transmission, "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," dated December 13, 2002

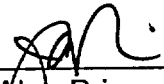
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There are no regulatory commitments contained within this letter.

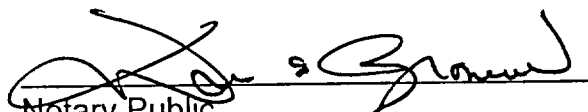
If you should have any questions regarding this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

  
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J. Alan Price  
Site Vice President - Millstone

Sworn to and subscribed before me  
this 14 day of JANUARY, 2003

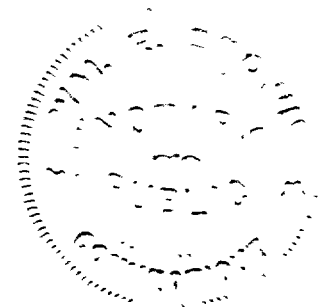
  
\_\_\_\_\_  
Notary Public

My Commission Expires 3/31/06 **WM. E. BROWN**  
**NOTARY PUBLIC**  
MY COMMISSION EXPIRES MAR 31 2006

Attachment (1)

cc: H. J. Miller, Region I Administrator  
R. B. Ennis, NRC Senior Project Manager, Millstone Unit No. 2  
Millstone Senior Resident Inspector

Director  
Bureau of Air Management  
Monitoring and Radiation Division  
Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127



Docket No. 50-336  
B18818

Attachment 1

Millstone Power Station, Unit No. 2  
Response to a Request for Additional Information  
License Basis Document Change Request 2-14-01  
Containment Isolation, Reactor Building Closed Cooling Water, and  
Service Water Surveillance Requirements  
Supplemental Information

Response to a Request for Additional Information  
License Basis Document Change Request 2-14-01  
Containment Isolation, Reactor Building Closed Cooling Water, and  
Service Water Surveillance Requirements  
Supplemental Information

In a letter dated February 5, 2002,<sup>(1)</sup> Dominion Nuclear Connecticut, Inc. (DNC) requested changes to the Millstone Unit No. 2 Technical Specifications. On December 13, 2002,<sup>(2)</sup> two (2) questions related to the aforementioned Technical Specifications Change Request were received via facsimile from the Nuclear Regulatory Commission. These two questions were discussed during a conference call conducted on December 18, 2002. The questions and associated responses are presented below:

Question 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.

Response

The requirement to verify manual containment isolation valves (CIVs) are secured in the proper position is contained in Surveillance Requirement (SR) 4.6.1.1.a of Technical Specification 3.6.1.1, "Containment Systems - Primary Containment - Containment Integrity." This SR is technically equivalent to SRs 3.6.3.3 and 3.6.3.4 of NUREG-1432.

The proposed Technical Specification changes contained in the February 5, 2002, submittal do not modify SR 4.6.1.1.a. Changes to SR 4.6.1.1.a have been proposed by

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<sup>(1)</sup> J A Price letter to U.S Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, License Basis Document Change Request 2-14-01, Containment Isolation, Reactor Building Closed Cooling Water, and Service Water Surveillance Requirements," dated February 5, 2002.

<sup>(2)</sup> R. B Ennis (NRC) Facsimile Transmission, "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," dated December 13, 2002.

a letter dated August 14, 2002,<sup>(3)</sup> but these proposed changes do not affect the requirement to periodically verify manual CIVs are secured in the proper position.

### Question 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.

### Response

The proposed changes to the Reactor Building Closed Cooling Water (RBCCW) and Service Water (SW) pump SRs remove the specific pump performance acceptance criteria from Technical Specifications 3.7.3.1, "Plant Systems - Reactor Building Closed Cooling Water System;" and 3.7.4.1, "Plant Systems - Service Water System." However, verification of acceptable RBCCW and SW pump performance is still required by Technical Specification 4.0.5, the Inservice Testing (IST) Program. This program periodically monitors the performance of the RBCCW and SW pumps to detect pump degradation, thereby ensuring the pumps will meet the safety analysis requirements.

The IST Program pump performance criteria (reference value) may change based on pump maintenance or design changes. It may be more restrictive than the safety analysis pump requirements, but it will not be less restrictive. The IST Program requires a comparison of hydraulic acceptance criteria limits with the safety analysis requirements to ensure degradation below minimum values is not allowed. Therefore, the IST Program will ensure the performance of the RBCCW and SW pumps will meet all safety analysis requirements.

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<sup>(3)</sup> J A Price letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, License Basis Document Change Request 2-17-02, Containment Systems," dated August 14, 2002.