

January 28, 2003

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - REACTIVITY CONTROL
SYSTEMS, POWER DISTRIBUTION LIMITS, AND SPECIAL TEST
EXCEPTIONS, MILLSTONE POWER STATION, UNIT NO. 2 (TAC NO. MB6108)

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 reactivity control systems, power distribution limits, and special test exceptions.

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 time frame was discussed with Mr. Ravi Joshi of your staff on January 23, 2003. 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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Millstone Power Station
Unit 2

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS
REACTIVITY CONTROL SYSTEMS, POWER DISTRIBUTION LIMITS, AND
SPECIAL TEST EXCEPTIONS
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 reactivity control systems, power distribution limits, and special test exceptions.

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, the following additional information is requested:

1. The factors to be considered in the Shutdown Margin (SDM) determination as currently specified in Surveillance Requirement (SR) 4.1.1.1.d is proposed for deletion and the wording relocated to the corresponding TS Bases section. Provide justification for this change.
2. In Attachment 1, Page 3 of your submittal, you state that Conditions D and Required Action D.1 in the proposed revision to TS 3/4.1.3.1 covers the deletion of current SR 4.1.1.1.a. However, SR 4.1.1.1.a applies when rods are immovable or untrippable, and proposed TS 3/4.1.3.1, Condition D, only applies when the rods are untrippable. What is the difference between immovable and untrippable? How do you account for immovable rods? Furthermore, your current SR 4.1.1.1.a requires that you increase SDM by an amount equal to the withdrawn worth of the inoperable rod, but your proposed TSs do not contain this requirement. Provide justification for this change.
3. For proposed SR 4.1.1.2, Note 2, you state that the SR will only be required after 60 Effective Full Power Days. However, your current SR 4.1.1.2 does not allow for this 60-day period. Provide justification for this change.
4. It is our understanding that you perform SR 4.1.1.1.c to confirm that you meet the Core Operating Limits Report requirements for SDM when you are at your Transient Insertion Limits. Attachment 1, Page 3 of your submittal states that deleting this requirement is acceptable because the SDM is met when the control element assemblies (CEAs) are within or at the insertion limits specified by TSs 3/4.1.3.5 and 3/4.1.3.6. Provide further justification for removal of this requirement, given that it appears its intent is to verify your Transient Insertion Limits. Furthermore, provide justification given that other factors affect SDM, including boron concentration, fuel burnup, xenon, samarium, etc.

Enclosure

5. Your current Limiting Condition for Operation (LCO) 3.1.3.1 states that each CEA shall be within 10 steps of all other CEAs in its group. Your proposed LCO 3.1.3.1 states that each CEA shall be within 10 steps of its group. Provide justification for this change.
6. The proposed TS 3/4.1.3.1 Action B allows you to have six more hours until you are in Mode 3 than your current TS 3/4.1.3.1 Action b. Provide justification for this change. Furthermore, justify why 6 hours to achieve Mode 3 is acceptable for all the action statements of TS 3/4.1.3.1.
7. Current LCO 3.1.3.6, Action c.2, requires the plant to be in HOT STANDBY (i.e., Mode 3) within 4 hours. Proposed LCO 3.1.3.6, Action C.1, would extend the time to achieve Mode 3 from 4 to 6 hours. Attachment 1, Page 27 of your submittal states that this is consistent with TS 3.0.3. Provide justification for this change from a safety standpoint.
8. Current LCO 3.2.4 Action b allows plant operation for up to 2 hours with the AZIMUTHAL POWER TILT (T_q) > 0.10, provided that the TOTAL UNRODDED INTEGRATED RADIAL PEAKING FACTOR (F_r^T) is within the limits of TS 3.2.3. However, your proposed changes (Action b.1) allow you to operate for 2 hours in this condition prior to checking F_r^T . Attachment 1, Page 28 of your submittal states that 2 hours is sufficient time for the operator to evaluate that this factor is within limit. Provide justification for this change from a safety standpoint.
9. When performing SDM calculations, how do you account for Doppler Reactivity? Consider addressing this consideration in TS Bases 3/4.1.1.1.