

February 6, 2003

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

FROM: Richard B. Ennis, Senior 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. MB5008)

The attached information was transmitted by facsimile on February 5, 2003, 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 May 7, 2002, as supplemented January 16, 2003. The proposed amendment would change Technical Specifications (TSs) 2.2, "Limiting Safety System Settings," and 3/4.3, "Instrumentation," to more accurately reflect the existing plant design for the Reactor Protection System (RPS), the Engineered Safety Features Actuation System (ESFAS), and the Radiation Monitoring System instrumentation and to provide consistency within TS Tables 2.2-1, 3.3-1, and 4.3-1.

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
LIMITING SAFETY SYSTEM SETTINGS AND INSTRUMENTATION
MILLSTONE POWER STATION, UNIT NO. 2
DOCKET NO. 50-336

By letter dated May 7, 2002, Dominion Nuclear Connecticut, Inc. (DNC or the licensee), submitted a proposed amendment to the Technical Specifications (TSs) for Millstone Power Station, Unit No. 2 (MP2). The proposed amendment would change TSs 2.2, "Limiting Safety System Settings," and 3/4.3, "Instrumentation," to more accurately reflect the existing plant design for the Reactor Protection System (RPS), the Engineered Safety Features Actuation System (ESFAS), and the Radiation Monitoring System instrumentation and to provide consistency within TS Tables 2.2-1, 3.3-1, and 4.3-1.

By letter dated November 8, 2002, the Nuclear Regulatory Commission (NRC) staff provided a Request for Additional Information (RAI) to DNC with respect to the submittal dated May 7, 2002. The licensee provided a response to the RAI by letter dated January 16, 2003. The 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 submittals. The "TS Change No." referenced in each of the following questions corresponds with the change number as designated in Attachment 1 of DNC's submittal dated May 7, 2002.

1) TS Change Nos. 1, 5, and 10

The response to RAI question 1 in the submittal dated January 16, 2003, states that DNC has proposed to eliminate the Reactor Coolant Pump underspeed trip consistent with the requirements of 10 CFR 50.36. Please justify deleting these TS requirements based on each of four criterion in 10 CFR 50.36(c)(2)(ii).

2) TS Change Nos. 6, 13.a - 13.f, and 13.h

The RAI response does not address the concern that the proposed Table 3.3-1 functional unit, item 13 (RPS Logic Matrices) and proposed Table 3.3-4 Action 5 (ESFAS Automatic Actuation Logic) do not entirely model either NUREG-0212 (Specification 3.3.1, 3.3.2) or NUREG-1432 (Specification 3.3.4 - analog, 3.3.6 - analog). Thus, the proposed TS represent a blend of LCO requirements and actions taken from both NUREGs. The staff notes the proposed Actions (Action 5 for RPS Logic Matrices and Action 5 for ESFAS Actuation Logic) includes an allowance to bypass a channel for up to one hour for surveillance testing. The bypass allowance is consistent with the action requirements in NUREG-0212, but not consistent with the action requirements of NUREG-1432. In the same manner, the staff notes the proposed Action 5 specifies a 48 hour completion time to restore an inoperable channel to operable status for RPS Logic Matrices and ESFAS Actuation Logic that is consistent with requirements in NUREG-1432, but not consistent with

the requirements of NUREG-0212. Discuss the technical basis for deviating from current Standard Technical Specification precedents.

The staff recommends adopting NUREG-0212 functional units requirements for Table 3.3-1 that are consistent with current TS functional units surveillances in Table 4.3-1.

3) TS Change No. 17

Proposed change 17 would add new Surveillance Requirement 4.3.3.1.3 for response time testing of the control room isolation function. The response to RAI question 8 in the submittal dated January 16, 2003, states that the proposed test frequency (one channel every 18 months, with both channels being tested once every 36 months) is consistent with the frequency specified for ESFAS per current TS 4.3.2.1.3. What is the safety basis for the proposed test interval?