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

Dominion

JUN 24 2003

Docket No. 50-336
B18918

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

Millstone Power Station, Unit No. 2
Withdrawal of a Request for Relaxation from Inspection Requirements in
Section IV.C(1)(a) of the Order EA-03-009 (TAC No. MB8164)

On February 11, 2003,[1] the Nuclear Regulatory Commission (NRC) issued the Order EA-03-009 for Interim Inspection Requirements for Reactor Pressure Vessel [RPV] Heads at Pressurized Water Reactor facilities. The Order requires specific inspection of the RPV head and associated penetration nozzles. Dominion Nuclear Connecticut, Inc. (DNC) submitted the Millstone Unit No. 2 (MP2) response to the Order by letter dated February 28, 2003,[2] and indicated that it would be seeking a relaxation of requirements contained in the Order. DNC letter dated March 28, 2003,[3] requested relaxation from the Order, where it requires a bare metal visual (BMV) examination of 100 percent of the RPV head surface. DNC is revising its plans for the next refueling outage to support compliance with the Order requirements, which will include removal of the insulation from the RPV head to permit the performance of a BMV examination. Accordingly, this letter withdraws the request for relaxation previously submitted. The balance of this letter provides an overview of these examination plans.

The insulation removal from the MP2 RPV head will be destructive to the insulation and require asbestos abatement protocols that will employ tenting, and wetting down of the asbestos portions of the insulation as required to control the airborne release of asbestos fibers during insulation removal. Long handled tooling will also be used to gain access for removal of insulating materials and minimize exposure to radiation. During the insulation removal process, DNC will minimize to the extent practical the possibility of disturbing surface conditions of interest, while maintaining a priority for

(1) NRC Order EA-03-009, "Issuance of Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," dated February 11, 2003, (Accession No. ML030380470).

(2) DNC letter, "Millstone Power Station Unit No. 2, Answer to Order for Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," dated February 28, 2003, (Accession No. ML030710501).

(3) DNC letter, "Millstone Unit No. 2 Request for Relaxation from Section IV(C)(1)(a) of the Order Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads," March 28, 2003, (Accession No. ML030920482).

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worker safety and As-Low-As-Reasonably-Achievable (ALARA) radiation exposure program goals.

After insulation removal processes are accomplished, a BMV of 100 percent of the RPV head surface, including 360 degrees around each head penetration, will be performed. The Control Element Drive Mechanism (CEDM) RPV head shroud that sits on top of the RPV head is welded in place and will not be removed for this examination. Visual access to the RPV head surface will be made as practical by direct means, with the use of a boroscope through portals in the CEDM shroud, and from above. DNC believes that this plan for the BMV examination to the MP2 RPV head constitutes compliance with the examination requirement in Section IV.C(1)(a) of the Order.

There are no regulatory commitments contained within this letter.

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

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

J. Alan Price
Site Vice President - Millstone

Sworn to and subscribed before me

this 24 day of June, 2003

Diane M. Phillipo
Notary Public

My Commission expires

DIANE M. PHILLIPO
NOTARY PUBLIC
MY COMMISSION EXPIRES 12/31/2005

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

The Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555