

**From:** Russell Arrighi  
**To:** William\_R\_Watson@dom.com  
**Date:** 3/17/04 4:08PM  
**Subject:** Draft RAIs attached

Bill,

Attached are draft RAIs for both Millstone Unit 2 and Unit 3. The Millstone Unit 2 Draft RAIs (end in suffix "A"); Unit 3 Draft RAIs (end in suffix "B").

Russ

**DRAFT REQUEST FOR ADDITIONAL INFORMATION (D-RAI)  
MILLSTONE 2/3 NUCLEAR POWER PLANT  
LICENSE RENEWAL APPLICATION**

**Millstone Unit 2 Draft RAIs (end in suffix "A"); Unit 3 Draft RAIs (end in suffix "B")**

**2.3 SCOPING AND SCREENING RESULTS — MECHANICAL SYSTEMS**

**Section 2.3.2.5, Spent Fuel Pool Cooling System**

**D-RAI 2.3.2.5-1A**

Millstone Unit 2 FSAR Section 9.5.3.3 states that in the event that a serious leak develops in the spent fuel pool (SFP) liner, makeup water is supplied to the pool from the primary makeup water (PMW) system by manual initiation from the 14'6" level of the auxiliary building, and that should the leakage exceed the 50 gpm normal makeup capability, additional makeup is available from the refueling water storage tank (RWST) via the refueling water purification system, and the fire protection system by temporary hose connections. License renewal drawing 25203-LR26023, Sheet 2, shows portions of the flow paths from the PMW and RWST systems to the SFP in scope and subject to an AMR. Provide justification to explain why all portions of the PMW and RWST makeup paths are not included within the scope of license renewal and subject to an AMR or justify their exclusion.

**2.3.3.3, Service Water System**

**D-RAI 2.3.3.3-1A**

On license renewal drawing 25203-LR26008, Sheet 2, at locations B6, B9, and B12, the service water strainers overflow lines are shown as outside the scope of license renewal and excluded from being subject to an AMR. Failure of the overflow line may cause the service water to flow to the outside of the strainer and on safety related components in the intake structure. Provide justification to explain why these drain lines are excluded from being within the scope of license renewal and subject to an AMR or justify their exclusion.

**Section 2.3.3.28, Process and Area Radiation Monitoring System**

**D-RAI 2.3.3.28-1A**

LRA Section 2.3.3.28 states that this system is within the scope of license renewal because it meets the requirements of 10 CFR 54.4(a)(1) by providing, among other things, "actuation of certain systems or components in response to detected radiation conditions." In order to perform this function, the section of piping downstream of valves 2-AC-527 and 2-AC-529 serves as a pressure boundary. This section of piping is not shown on license renewal drawing 25203-LR26028, Sheet 2, sections J6 and G6, as being within the scope of license renewal. Clarify whether these components are within the scope of license renewal and subject to an

AMR or justify their exclusion.

### **Section 2.3.3.35, Diesel Generator System**

#### **D-RAI 2.3.3.35-1A**

On license renewal diagram 25203-LR26010, Sheet 1, at locations F8 and J8, governors are shown as not subject to an AMR. Although the governor itself is an active component, its housing serves a pressure boundary intended function. The governor housing is not listed in LRA Tables 2.3.3-34 or 3.3.2-34 as a component within the scope of license renewal. Clarify whether this component is included with another component type. If not, justify its exclusion from the scope of license renewal and from being subject to an AMR or update the corresponding tables to include this component.

### **2.3.4.10 Plant Heating and Condensate Recovery System**

#### **D-RAI 2.3.4.10-1A**

Unit 2 LRA drawing 25203-LR26026 Sheet 3 of 5 does not show the refueling water storage tank (RWST) heat exchanger and attached piping as part of the evaluation boundary. A potential leak in this heat exchanger or the attached piping inside of the RWST could potentially reduce the boron concentration in the tank and thereby impact the safe shutdown boric acid requirements.

Include the RWST heat exchanger and the attached piping inside of the RWST within the scope of license renewal or provide justification to explain why these components are excluded from being within the scope of license renewal and subject to an AMR.

## Millstone Unit 3 RAIs (end in suffix "B")

### 2.3.3.2 Service Water System

#### D-RAI 2.3.3.2-1B

License renewal drawing 25212-LR26933, Sheet 2, shows an in-line flow indicator (FI-162), at location N8 within the scope of license renewal and subject to an AMR. However, this component is not listed in LRA Table 2.3.3-2 as a component type subject to an AMR. In-line flow indicators serve a pressure boundary intended function.

Clarify whether the in-line flow indicator is included with some other component type that is listed in LRA Table 2.3.3-2. If not, justify its exclusion from the scope of license renewal and from being subject to an AMR, or update the corresponding tables to include this component.

#### D-RAI 2.3.3.2-2B

License renewal drawing 25212-LR26933, Sheet 2, shows thermowells (TW-65A, B, C and D) at locations H6, H5, H9 and H3, excluded from being within the scope of license renewal and subject to an AMR. Thermowells normally penetrate the piping pressure boundary; therefore, they serve a pressure boundary intended function.

Clarify whether the above described thermowells are included with some other component type that is listed in LRA Table 2.3.3-2. If not, justify their exclusion from the scope of license renewal and from being subject to an AMR, or update the corresponding tables to include this component.

### Section 2.3.4.3, Feedwater System

#### D-RAI 2.3.4.3-1B

Unit 3 license renewal drawing 25212-LR26930, Sheets 3 and 4, indicates that a portion of the feedwater system is continued on license renewal drawing 26930, Sheet 1. However, this drawing is not included in the LRA. Additionally, Unit 3 LRA Section 2.3.4.2 states that "the evaluation boundary begins at the feedwater flow elements" but does not identify the particular elements to which the LRA refers. Please provide LRA drawing 26930, Sheet 1, and identify the "flow elements" that are mentioned in LRA Section 2.3.4.2.