

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



September 21, 2004

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

Serial No. 04-003A  
NL&OS/PRW R0  
Docket No. 50-336  
License No. DPR-65

**DOMINION NUCLEAR CONNECTICUT, INC. (DNC)**  
**MILLSTONE POWER STATION UNIT 2**  
**PROPOSED RISK-INFORMED TECHNICAL SPECIFICATIONS CHANGE**  
**FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL**  
**ADMINISTRATIVE CORRECTION**

In a letter dated July 6, 2004, Dominion Nuclear Connecticut, Inc. (DNC) requested an amendment to Operating License DPR-65 for Millstone Power Station Unit 2 in the form of a change to the Technical Specifications for Millstone Power Station Unit 2. The proposed change would permit a one-time, five-year extension of the ten-year performance-based Type A test interval established in NEI 94-01, "Nuclear Energy Institute Industry Guideline For Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," Revision 0, dated July 26, 1995.

It was subsequently determined that a sentence was inadvertently omitted at the end of the proposed wording change on the marked up and retyped pages provided with the submittal. The omitted sentence specifies the end date of the interval by which the Type A test must be completed. Accordingly, DNC requests that Attachments 3 and 4 of the subject letter be replaced with the substitute attachments enclosed with this letter.

The substitution of the enclosures to this letter in place of Attachments 3 and 4 of the July 6, 2004 letter does not alter the proposed amendment or the Significant Hazards Consideration pursuant to the provisions of 10 CFR 50.92 found in Attachment 1 of the July 6, 2004 letter.

In accordance with 10CFR50.91(b), a copy of this letter is being provided to the State of Connecticut.

If you should have any questions regarding this submittal, please contact Mr. Paul R. Willoughby at (804) 273-3572.

Very truly yours,

Leslie N. Hartz  
Vice President – Nuclear Engineering

Enclosures:

1. Substitute Attachment 3 to July 6, 2004 letter: Marked-up Pages
2. Substitute Attachment 4 to July 6, 2004 letter: Re-typed Pages

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission  
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**ENCLOSURE 1**

**PROPOSED RISK-INFORMED TECHNICAL SPECIFICATIONS CHANGE**  
**FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL**  
**ADMINISTRATIVE CORRECTION**

**SUBSTITUTE ATTACHMENT 3**  
**LETTER SERIAL NO. 04-003**

**MILLSTONE POWER STATION, UNIT 2**  
**DOMINION NUCLEAR CONNECTICUT, INC.**

Serial Number 04-003  
Five-Year Extension of Type A Test Interval

**ATTACHMENT 3**

**PROPOSED RISK-INFORMED TECHNICAL SPECIFICATIONS CHANGE**  
**FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL**

**MARK-UP OF TECHNICAL SPECIFICATIONS**

**MILLSTONE POWER STATION, UNIT 2**  
**DOMINION NUCLEAR CONNECTICUT, INC.**

ADMINISTRATIVE CONTROLS

6.19 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

A program shall be established to implement the leakage rate testing of the primary containment as required by 10CFR50.54(o) and 10CFR50, Appendix J, Option B as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated primary Containment internal pressure for the design basis loss of coolant accident is  $P_a$ .

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , is 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary containment overall leakage rate acceptance criterion is  $< 1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are  $< 0.60 L_a$  for the combined Type B and Type C tests, and  $< 0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  - 1. Overall air lock leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .
  - 2. For each door, pressure decay is  $\leq 0.1$  psig when pressurized to  $\geq 25$  psig for at least 15 minutes.

The provisions of SR 4.0.2 do not apply for test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of SR 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

6.20 RADIOACTIVE EFFLUENT CONTROLS PROGRAM

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the REMODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the REMODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10CFR 20.1001-20.2402;

AS MODIFIED BY THE FOLLOWING EXCEPTION TO NEI 94-01, REV. 0, "INDUSTRY PERFORMANCE-BASED OPTION OF 10 CFR PART 50, APPENDIX J,": THE FIRST TYPE A TEST PERFORMED AFTER THE JUNE 10, 1995 TYPE A TEST SHALL BE PERFORMED NO LATER THAN JUNE 10, 2010.

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**ENCLOSURE 2**

**PROPOSED RISK-INFORMED TECHNICAL SPECIFICATIONS CHANGE**  
**FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL**  
**ADMINISTRATIVE CORRECTION**

**SUBSTITUTE ATTACHMENT 4**  
**LETTER SERIAL NO. 04-003**

**MILLSTONE POWER STATION, UNIT 2**  
**DOMINION NUCLEAR CONNECTICUT, INC.**

Serial Number 04-003  
Five-Year Extension of Type A Test Interval

**ATTACHMENT 4**

**PROPOSED RISK-INFORMED TECHNICAL SPECIFICATIONS CHANGE**  
**FIVE-YEAR EXTENSION OF TYPE A TEST INTERVAL**

**RETYPE TECHNICAL SPECIFICATIONS PAGE**

**MILLSTONE POWER STATION, UNIT 2**  
**DOMINION NUCLEAR CONNECTICUT, INC.**

## ADMINISTRATIVE CONTROLS

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The peak calculated primary Containment internal pressure for the design basis loss of coolant accident is  $P_a$ .

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , is 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary containment overall leakage rate acceptance criterion is  $< 1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are  $< 0.60 L_a$  for the combined Type B and Type C tests, and  $< 0.75 L_a$  for Type A tests;
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The provisions of SR 4.0.2 do not apply for test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of SR 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

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This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the REMODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

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