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

Dominion

January 13, 2005

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

Serial No. 04-155B
NL&OS/PRW R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
SUPPLEMENT TO RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REQUEST TO IMPLEMENT A RISK-INFORMED INSERVICE INSPECTION PROGRAM PLAN AS AN ALTERNATIVE TO ASME CODE SECTION XI REQUIREMENTS

By a letter dated November 10, 2003, Dominion Nuclear Connecticut, Inc. (DNC) requested NRC approval to implement a Risk-Informed Inservice Inspection (RI-ISI) Program (Relief Request RR-89-40) as an alternative to the American Society of Mechanical Engineers (ASME) Section XI inservice inspection requirements for Class 1 piping at Millstone Unit 2 (MPS2). Additionally, DNC requested NRC approval to allow a pressure test and corresponding VT-2 visual examination (Relief Request RR-89-41) in lieu of a volumetric examination for socket welds of any size and branch pipe connection welds Nominal Pipe Size (NPS) 2 inches and smaller that will be examined in accordance with the RI-ISI program.

On March 11, 2004, a Request For Additional Information (RAI) was received from the Nuclear Regulatory Commission (NRC) staff containing eight questions related to Relief Request RR-89-40 and two questions related to RR-89-41. In a letter dated July 6, 2004, DNC provided a response to Questions 1 and 3 through 8 for RR-89-40 and Questions 1 and 2 for RR-89-41.

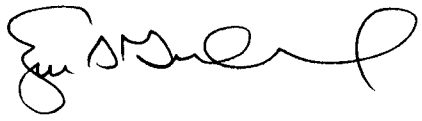
In a facsimile dated August 18, 2004, the NRC staff forwarded an RAI containing an additional seven questions related to the answers provided in the July 6, 2004 response. In a letter dated October 12, 2004, DNC provided a response to Question 2 of the original RAI along with the response to the August 18, 2004 RAI.

As agreed upon in a conference call January 4, 2005, DNC is providing a replacement for page 6 of 7 of Attachment 2 to the October 12, 2004 letter, which clarifies Note 6 on that page regarding the total number of welds in the system. Enclosure 1 of this letter is the replacement page.

The additional information provided in this letter does not affect the previous conclusions made in the Safety Summary and Significant Hazards Consideration contained in the DNC letter of November 10, 2003.

If you have any questions or require additional information, please contact Mr. Paul R. Willoughby at (804) 273-3572.

Very truly yours,



Eugene S. Grecheck
Vice President – Nuclear Support Services

Enclosure: (1)

Commitments made in this letter: None.

cc: U.S. Nuclear Regulatory Commission
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ENCLOSURE 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
OCTOBER 12, 2004
REQUEST TO IMPLEMENT A RISK-INFORMED INSERVICE INSPECTION PROGRAM PLAN AS AN ALTERNATIVE TO ASME CODE SECTION XI REQUIREMENTS

REPLACEMENT
ATTACHMENT 2 PAGE 6 OF 7

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

Table 5-1, Column By Column, Explanation

1. System = Lists the acronyms used for the systems (e.g., CH = Charging System, SI = Safety Injection System, and RC = Reactor Coolant System) where the High Safety Significant (HSS) segments are located.
2. Number of HSS segments = Lists the HSS segments contained in each system of Column 1.
3. Degradation Mechanisms = Shows all of the degradation mechanisms postulated for systems in column 1 and all of the HSS segments in each system listed in column 2.
4. Class = Lists the ASME Class (i.e., Class 1 only for MPS 2) for all the welds in each of the systems and HSS segments listed in Columns 1 and 2.
5. ASME Code Category = Lists the ASME Code Section XI, 1989 Edition, Examination Categories (e.g., B-F = Class 1 Pressure Retaining Dissimilar Metal Welds and B-J = Class 1 Pressure Retaining Welds In Piping) for all of the systems and HSS segments listed in Columns 1 and 2.
6. Weld Count (Section XI / Exempt ≤ NPS1) = The column is subdivided to show numbers of butt welds in 6a and numbers of socket welds in 6b. These numbers are split between Section XI welds and exempt welds (ones that are ≤ NPS1). These weld numbers represent the total population of welds in each system of column 1 and all the HSS segments for that system in column 2. Example: The SI system has 4 HSS Segments and there is a total of 118 butt welds that are currently large enough to be part of the existing Section XI weld population in this system and a total of 142 socket welds in this same system that are currently not required to be nondestructively examined under Section XI. Therefore, the total population of all the welds in the SI system is 260 welds.
7. ASME Section XI Examination Methods = This column is split to show numbers of welds that require volumetric and surface examinations per Section XI under 7a and welds that only require surface examinations in Section XI under 7b. Thus this column shows the total numbers of welds that are currently scheduled for examination at MPS 2 under the Section XI program. Example: For the entire SI system there is a total of 30 welds being examined by a volumetric and surface examination method under Section XI and this number is not related to the HSS segments of column 2.
8. RI-ISI = This column is split to first identify under 8a the SES Matrix Regions for all the welds selected under the RI-ISI program per the HSS segments identified in Column 2 and per the systems identified in column 1. Additionally, an examination Category split is provided between B-F and B-J welds of column 5 where both Categories exist in the RC system. Secondly, 8b shows the number of welds being examined under the RI-ISI program and the types of examinations along with whether they are part of the program or are part of RR-89-41. Example: For the SI system, 4 HSS