

March 10, 2005

MEMORANDUM TO: John A. Nakoski, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Stephen Monarque, Project Manager, Section 1 */RA/*  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE POWER STATION, UNIT NOS. 1, 2, AND 3; NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2; SURRY POWER STATION, UNIT NOS. 1 AND 2 - FACSIMILE TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MC4410, MC4411, MC4412, MC4413, MC4745, MC4746, AND MC4747)

The attached draft request for additional information (RAI) was transmitted by facsimile on March 10, 2005, to Mr. Paul Willoughby, Virginia Electric and Power Company (VEPCO). This draft RAI was transmitted to facilitate the technical review being conducted by the NRC staff and to support a conference call with VEPCO and Dominion Nuclear Connecticut, Inc. (DNC) in order to clarify certain items in the licensee's submittal. This draft RAI is related to VEPCO's and DNC's proposed license amendments dated September 15, 2004, and September 8, 2004, respectively. These submittals support the implementation of the Nuclear Facility Quality Assurance Program Description (Topical Report DOM-QA-1). Review of the RAI would allow VEPCO and DNC to determine and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket Nos. 50-280, 50-281, 50-338, 50-339, 50-245, 50-336, and 50-423

Enclosure: Draft Request for Additional Information

March 10, 2005

MEMORANDUM TO: John A. Nakoski, Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Stephen Monarque, Senior Project Manager, Section 2/RA/  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE POWER STATION, UNIT NOS. 1, 2, AND 3; NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2; SURRY POWER STATION, UNIT NOS. 1 AND 2 - FACSIMILE TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MC4410, MC4411, MC4412, MC4413, MC4745, MC4746, AND MC4747)

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Enclosure: Draft Request for Additional Information

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

MILLSTONE POWER STATION, UNIT NOS. 1, 2, AND 3

NORTH ANNA POWER STATION, UNIT NOS. 1 AND 2

SURRY POWER STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-280, 50-281, 50-338, 50-339, 50-245, 50-336, AND 50-423

By letters dated September 15, 2004, and September 8, 2004, Virginia Electric and Power Company (VEPCO) and Dominion Nuclear Connecticut, Inc. (DNC) submitted proposed license amendments to support the implementation of the Nuclear Facility Quality Assurance Program Description (Topical Report DOM-QA-1). In the following Request for Additional Information, VEPCO and DNC together shall be referred to as the "licensee." The NRC has developed the following draft questions during its review of the letter:

North Anna Power Station, Units 1 and 2

1. Technical Specification (TS) 5.3.1 requires that, "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI 3.1 (12/79 Draft) for comparable positions. Exceptions to this requirement are specified in VEPCO's QA Topical Report, VEP-1, 'Quality Assurance Program, Operational Phase.'" The licensee has proposed to delete the reference to ANSI 3.1 (12/79 Draft) and replace it with "as specified in the Quality Assurance Program." This information would be relocated to the Dominion Quality Assurance Program. However no justification was provided for the proposed change. In addition, the Standard Technical Specifications (STS) for Westinghouse plants state that, "Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff]." Based on the proposed change, the NRC staff cannot ensure that the facility staff qualifications at North Anna will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff should remain in the TS.

2. TS 5.3.1 proposes to relocate the qualifications of the radiation protection manager from the TS to the Dominion Quality Assurance Plan. Describe programmatic controls to ensure that changes to the qualifications will require NRC review and approval prior to implementation of the changes.

Surry Power Station, Units 1 and 2

1. TS 6.1 is modified by proposed change C.3, which states that the responsibility of the Shift Manager for the control room command function is added for emphasis as to the importance of the position responsibility and for consistency with the North Anna TS. However, North Anna TS 5.1.2 has additional wording regarding the absence of the shift manager, which is consistent with the STS wording. The additional wording is: "During any absence of the SS from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function."

During any absence of the SS from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.” This wording should be adopted by the licensee to maintain consistency with the North Anna TS. This additional wording should be located in TS 6.1 and not part of Table 6.1-1.

2. TS 6.1.B.1 requires that, “Each member of the facility staff shall meet or exceed the minimum qualifications of ANS 3.1 (12/79 Draft) for comparable positions, except for:.” The licensee has proposed to delete the reference to ANS 3.1 (12/79 Draft) and the associated footnote and replace it with “as specified in the Quality Assurance Program.” This information would be relocated to the Dominion Quality Assurance Program. However, no justification was provided for the proposed change. In addition, the STS for Westinghouse plants state that, “Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].” Based on the proposed change, the NRC staff cannot ensure that the facility staff qualifications at Surry will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff should remain in the TS.

3. TS 6.1.B.2 will be modified to state, “Incumbents in the positions of Shift Manager, Unit Supervisor (SRO), Control Room Operator (RO), and the individual providing advisory technical support to the unit operations shift crew shall meet or exceed the requirements of 10 CFR 55.59(c) and 55.31(a)(4).” Describe how the requirements of 10 CFR 55.59(c) and 55.31(a)(4) apply to these positions. In addition, do the requirements contained in the proposed revision to TS 6.1.B.2 apply to the Shift Technical Advisor (STA)? Describe programmatic controls to ensure that changes to the retraining and replacement training programs will continue to meet or exceed the requirements and recommendations of ANS 3.1 (12/79 Draft).

4. The Commission Policy Statement on Engineering Expertise on Shift established the education criteria for STAs. Where within the operating license can the education criteria for the STA be found? Describe programmatic controls to ensure that changes to the training and educational qualifications of the STA will continue to meet the Policy Statement.

#### Millstone Power Station, Units 1, 2, and 3

1. For Millstone, Unit 1, TS 5.3.1 requires that, “Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:.” The licensee has proposed to delete the reference to ANSI N18.1-1971 and replace it with “as specified in the Quality Assurance Program.” This information would be relocated to the Dominion Quality Assurance Program. However, no justification was provided for the proposed change. In addition, the STS for BWR/4 and BWR/6 state that “Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].” Based on the proposed

change, the NRC staff cannot ensure that the facility staff qualifications at Millstone, Unit 1 will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff should remain in the TS.

2. TS 5.3.1.2, 6.3.1.c, and 6.3.1.b of Millstone, Units 1, 2, and 3, respectively, propose to relocate the qualifications of the radiation protection manager from the TS to the Dominion Quality Assurance Plan. Describe programmatic controls to ensure that changes to the qualifications will require NRC review and approval prior to implementation of the changes.

3. For Millstone, Unit 3, the licensee has proposed to delete the discussion of the STA qualifications from TS 6.4.2.1. This information is proposed to be relocated to the Dominion Quality Assurance Plan. The Commission Policy Statement on Engineering Expertise on Shift established the education criteria for STAs. Describe programmatic controls to ensure that changes to the training and educational qualifications of the STA will continue to meet the Policy Statement. In addition, STS has an additional sentence which states, "This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift." The STS wording should be adopted for consistency with the North Anna TS.

4. For Millstone, Units 2 and 3, TS 6.3.1 requires that, "Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:." The licensee has proposed to delete the reference to ANSI N18.1-1971 and the associated footnote and replace it with "as specified in the Quality Assurance Program." This information would be relocated to the Dominion Quality Assurance Program. However, no justification was provided for the proposed change. In addition, the STSs state that, "Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff]." Based on the proposed change, the NRC staff cannot ensure that the facility staff qualifications at Millstone, Units 2 and 3 will meet or exceed the minimum qualifications acceptable to the NRC staff. Therefore, the NRC staff has concluded that the minimum qualifications of the facility staff and the associated footnote should remain in the TS.

5. For Millstone, Units 2 and 3, TS 6.4 states, "A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971\* and 10 CFR Part 55.59 shall be maintained." This TS requirement is no longer required as it duplicates requirements in 10 CFR. However, if this section is to be retained, describe programmatic controls to ensure that changes to the retraining and replacement training programs will continue to exceed the requirements and recommendations of ANSI N18.1-1971.