

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



July 7, 2005

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Serial No. 04-707A  
NLOS/PRW R0  
Docket Nos. 50-336  
50-423  
License Nos. DPR-65  
NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNITS 2 AND 3**  
**SUPPLEMENT TO PROPOSED TECHNICAL SPECIFICATIONS CHANGES**  
**SHUTDOWN OPERATIONS INVOLVING POSITIVE REACTIVITY ADDITIONS**

In a letter dated March 9, 2005, Dominion Nuclear Connecticut, Inc. (DNC) submitted a request to amend Operating Licenses DPR-65 for Millstone Power Station Unit 2 (MPS2) and NPF-49 for Millstone Power Station Unit 3 (MPS3). The changes incorporate wording for shutdown operations involving positive reactivity additions consistent with Improved Standard Technical Specifications Change Traveler, TSTF-286-A, Revision 2.

In a phone conversation May 24, 2005, DNC and the U. S. Nuclear Regulatory Commission (NRC) discussed clarifications to the request. The attachment to this letter contains supplemental wording to the request based on that phone conversation. This information describes procedures in use at Millstone and the normal practices associated with updating them as part of implementation of license amendments.

The additional information provided in this letter does not affect the conclusions of the safety summary and significant hazards considerations discussion in DNC's March 9, 2005, submittal.

Should you have any questions regarding the supplemental wording, please contact Mr. Paul R. Willoughby at (804) 273-3572.

Very truly yours,

A handwritten signature in black ink, appearing to read "E. Grecheck", written over a white background.

Eugene S. Grecheck  
Vice President – Nuclear Support Services

Attachment

There are no new commitments contained in this letter.

cc: U.S. Nuclear Regulatory Commission  
Region I  
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Mr. V. Nerses  
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Mr. S. M. Schneider  
NRC Senior Resident Inspector  
Millstone Power Station

COMMONWEALTH OF VIRGINIA    )  
  )  
COUNTY OF HENRICO            )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Eugene S. Grecheck, who is Vice President - Nuclear Support Services of Dominion Nuclear Connecticut, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 7<sup>th</sup> day of July, 2005.

My Commission Expires: August 31, 2008.

Margaret B. Bennett  
Notary Public

(SEAL)

**ATTACHMENT**

**SUPPLEMENT TO PROPOSED TECHNICAL SPECIFICATIONS CHANGES  
SHUTDOWN OPERATIONS INVOLVING POSITIVE REACTIVITY ADDITIONS**

**SUPPLEMENT TO SAFETY SUMMARY**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNITS 2 AND 3**

### **SUPPLEMENT TO SAFETY SUMMARY**

Per Section 4.0, Safety Summary of Attachments 1 and 4 of the Dominion Nuclear Connecticut letter dated March 9, 2005, the following wording is generally applied to describe introduction of coolant inventory to the reactor coolant system (RCS):

“Introduction of coolant inventory must be from sources that have a boron concentration greater than what would be required in the RCS for minimum shut down margin (SDM) or refueling boron concentration, but provides acceptable margin to maintaining subcritical operation. Coolant additions are controlled by plant operating procedures to ensure SDM and minimum required boron concentration are maintained.”

To address how coolant additions are to be controlled, the following supplemental information is provided:

Sources of borated RCS inventory makeup include the refueling water storage tank (RWST) and boric acid tanks. Borated makeup water to the RCS may be injected from each of the above sources individually, or may be injected as a blended boric acid solution from the boric acid tanks and a demineralized water source.

The plant operating procedures currently calculate the required SDM boron concentration for the operating conditions (e.g., plant operating mode, RCS temperature, core burnup, etc.) and other conditions as required. These SDM calculations will not be changed by the proposed technical specification change. As part of the implementation of the proposed changes to the TS, the plant operating procedures will be changed to add conditional statements to require that the boron concentration of the makeup water is greater than or equal to the required minimum SDM boron concentration (or the refueling boron concentration for the refueling operations limiting conditions for operation).

An example of the wording that may be proposed for the procedure changes for Millstone Unit 2:

1. IF RCS inventory makeup is required AND the Technical Specifications do NOT allow introduction of makeup water with boron concentration less than the required minimum SDM boron concentration, PERFORM one of the following:
  - Refer To OP 2304C, “Make Up (Boration and Dilution) Portion of CVCS,” and BORATE from RWST or boric acid storage tanks, OR

- Refer To OP 2208, "Reactivity Calculations" (for maintaining SDM), and OP 2304C, "Make Up (Boration and Dilution) Portion of CVCS," and PERFORM applicable action to inject makeup water at a boron concentration greater than the required shutdown boron concentration for current plant conditions"

Similarly, Millstone Unit 3 procedures will be modified to add conditional statements to require makeup water boron concentration greater than that required for the minimum SDM or refueling boron concentration.