



October 26, 2006

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

Serial No. 06-835  
NSS&L/DF R1  
Docket No. 50-423  
License No. NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 3**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**  
**REGARDING POST MAINTENANCE/MODIFICATION SURVEILLANCE**  
**REQUIREMENTS LICENSE AMENDMENT REQUEST**

In a letter dated March 28, 2006, Dominion Nuclear Connecticut, Inc. (DNC) submitted a request deleting redundant surveillance requirements (SRs) from the Millstone Power Station Unit 3 (MPS3) Technical Specifications. These SRs pertain to post-maintenance/post-modification testing. In a facsimile dated July 14, 2006, the NRC staff forwarded a request for additional information (RAI) in order to complete its review of DNC's request. A conference call between DNC personnel and NRC staff members to discuss the contents of the RAI was conducted on July 27, 2006. The response to the RAI for MPS3 is provided in Attachment 1 to this letter.

The additional information provided in this letter does not affect the conclusions of the significant hazards consideration discussion in the DNC letter dated March 28, 2006.

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

Very truly yours,

Gerald T. Bischof  
Vice President – Nuclear Engineering

Commitments in this letter: None

Attachments: (1)

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

**POST MAINTENANCE/MODIFICATION SURVEILLANCE  
REQUIREMENTS LICENSE AMENDMENT REQUEST**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

**DOMINION NUCLEAR CONNECTICUT, INC.  
MILLSTONE POWER STATION UNIT 3**

**RESPONSE TO REQUEST FOR ADDITION INFORMATION**  
**REGARDING POST MAINTENANCE/MODIFICATION SURVEILLANCE**  
**REQUIREMENTS LICENSE AMENDMENT REQUEST**

In a letter dated March 28, 2006, Dominion Nuclear Connecticut, Inc. (DNC) submitted a request for deleting redundant surveillance requirements (SRs) pertaining to post-maintenance/post-modification testing, from the Millstone Power Station Unit 3 (MPS3) Technical Specifications. In a facsimile dated July 14, 2006, the NRC staff forwarded a request for additional information (RAI) in order to complete its review of DNC's request. A conference call between DNC personnel and NRC staff members to discuss the contents of the RAI was conducted on July 27, 2006. The response to the RAI for MPS3 is provided in the balance of this attachment.

**NRC Question**

The licensee proposed to delete from the Technical Specifications the following post-maintenance SRs: SR 4.1.3.4.b, a portion of SR 4.5.2.g.1, and SR 4.5.2.h. The licensee claimed that the removal of these portions of the SRs is adequate by citing SR 4.0.1, which states in the associated Bases section, in part, that "upon completion of maintenance, appropriate post-maintenance testing is required to declare the equipment operable." However, neither SR 4.0.1 nor the associated Bases section specify what post-maintenance testing must be completed to fulfill the deleted SRs. For example, SR 4.1.3.4 requires that the rod drop time be demonstrated. SR 4.5.2.g requires verification of the correct position of each electrical and/or mechanical stop for emergency core cooling system throttle valves. SR 4.5.2.h requires that flow balance testing be performed on the charging pump lines, and residual heat removal pump lines.

Identify specific post-maintenance testing requirements in the relevant maintenance procedure or documentation, and justify that the test requirements equivalent to the deleted SRs discussed above will be completed in accordance with SR 4.0.1.

**DNC Response**

With the exception of SR 4.5.2.h, the balance of the SRs proposed for deletion in DNC's March 28, 2006 submittal are included in existing system test procedures. (See table below.) The "Frequency" section of those procedures contains language similar if not identical to that of the existing SR. While the specific TS SR references will be removed from the system test procedures and associated forms, the prescribed frequency (i.e. after maintenance or modification) will be

retained. The procedures are licensee-controlled documents and changes are made in accordance with 10 CFR 50.59.

Historically a unique procedure has been generated whenever TS SR 4.5.2.h was required to be performed. In order to preserve the fundamental requirement to perform ECCS flow balance testing to the specified acceptance criteria, the flow requirements for the centrifugal charging pump lines, safety injection pump lines, and RHR pump lines (TS SR 4.5.2.h.1, TS SR 4.5.2.h.2, TS SR 4.5.2.h.3) will be relocated to the MPS3 Technical Requirements Manual (TRM). The TRM will require the flow balance test to be performed following completion of modifications to the ECCS subsystems that adversely impact the flow rates described in the TRM. The TRM is a licensee-controlled document and changes to the TRM are made in accordance with 10 CFR 50.59.

<b>SR proposed for deletion</b>	<b>Millstone procedure</b>	<b>Frequency (relevant to SR proposed for deletion)</b>
4.1.3.4.b	SP 3451N22, Multiple Rod Drop Time Test, Rev 006-02	For specifically affected individual rods following any maintenance on or modification to the Control Rod Drive System which could affect the drop time of those rods.
Portion of 4.5.2.1.g.1	SP 3712Z, Setting Position of High Pressure Safety Injection Throttle Valves, Rev 004-01	Within 4 hours, after valve(s) maintenance
Portion of 4.6.6.1.b	SP 3614I.2, SLCRS Filter Bank Testing, Rev. 005-02	After any structural maintenance on the HEPA filter or charcoal adsorber housings
Portion of 4.7.7.c	SP 3614F.2, Control Room Emergency Ventilation, Rev. 007-07	After any structural maintenance on the HEPA filter or charcoal adsorber housings
Portion of 4.7.9.b	SP 3614A.2, Auxiliary Building Filter Testing, Rev. 007-03	After any structural maintenance on HEPA filter or charcoal adsorber housings
Portion of 4.8.1.1.2.h	SP 3646A.3, Diesel Generator Independence Test, Rev. 006	After modifications which could affect diesel generator interdependence