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U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555 Serial No. 07-0207 NSS&L/DF: R2' Docket Nos. 50-336, 50-423 License Nos. DPR-65, NPF-49

## DOMINION NUCLEAR CONNECTICUT, INC. MILLSTONE POWER STATION UNITS 2 AND 3 PROPOSED TECHNICAL SPECIFICATIONS CHANGE ASME CODE REFERENCE UPDATE (LBDCRS 07-MP2-014 & 07-MP3-009)

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) requests an amendment to Facility Operating Licenses DPR-65 and NPF-49 for Millstone Power Station Unit 2 (MPS2) and Unit 3 (MPS3), respectively. The proposed amendment will modify MPS2 and MPS3 Technical Specification (TS) 4.0.5 to reference the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) instead of Section XI of the ASME Boiler and Pressure Vessel Code. Additionally the redundant requirement in TS 4.0.5 to maintain an ISI program is being proposed for removal based on duplicate regulatory requirements in 10 CFR 50.55a.

The proposed changes are consistent with implementation of the MPS2 fourth and MPS3 third ten year Inservice Testing (IST) program in accordance with the requirements of 10 CFR 50.55a(f), "Inservice testing requirements." The MPS2 fourth ten year IST interval and MPS3 third ten year IST interval begin on April 1, 2008.

The proposed amendment is based on NRC-approved Technical Specification Task Force (TSTF) Traveler TSTF-479-A, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a," and TSTF-497-A, Revision 0, "Limit Inservice Testing Program Application to Frequencies of 2 Years or Less."

The proposed amendment does not involve a Significant Hazards Consideration pursuant to the provisions of 10 CFR 50.92. The Site Operations Review Committee has reviewed and concurred with this determination.

To ensure MPS2 and MPS3 TS are in compliance with ASME code by the start of the next IST interval, DNC requests approval of the proposed amendments by February 1, 2008, with the amendment being implemented within 60 days of issuance.

Attachment 1 to this letter contains an evaluation of the proposed changes and a significant hazards determination. Attachments 2 and 3 contain the marked-up TS pages for MPS2 and MPS3, respectively. TS Bases pages will be modified accordingly upon receipt of the proposed amendment in accordance with the Technical Specification Bases Control Program and are not included in this submittal.

Serial No. 07-0207 Docket Nos. 50-336, 50-423 ASME OM Code Reference Page 2 of 3

In accordance with 10 CFR 50.91(b), a copy of this license amendment request is being provided to the State of Connecticut.

If you have any questions or require additional information, please contact Mr. David W. Dodson at (860) 447-1791, extension 2346.

Very truly yours,

Gerald T. Bischof Vice President – Nuclear Engineering

Attachments: 1. Evaluation of Proposed License Amendment

2. MPS2 Marked-Up TS Pages

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3. MPS3 Marked-Up TS Pages

Commitments made in this letter: None

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gerald T. Bischof, who is Vice President – Nuclear Engineering, 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  $\frac{\partial^{N^{D}}}{\partial t}$  day of  $\frac{\partial UU}{\partial t}$ , 2007. My Commission Expires: Queust 31, 2008

Margarel B. Bennett Notary Public



Serial No. 07-0207 Docket Nos. 50-336, 50-423 ASME OM Code Reference Page 3 of 3

cc: U.S. Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, PA 19406-1415

> Mr. J. D. Hughey Project Manager U.S. Nuclear Regulatory Commission One White Flint North 11555 Rockville Pike Mail Stop 83B Rockville, MD 20852-2738

Mr. R. I. Treadway NRC Senior Resident Inspector Millstone Power Station

Director Bureau of Air Management Monitoring and Radiation Division Department of Environmental Protection 79 Elm Street Hartford, CT 06106-5127 **ATTACHMENT 1** 

# PROPOSED TECHNICAL SPECIFICATIONS CHANGE <u>ASME OM CODE REFERENCE</u> (LBDCRS 07-MP2-014 & 07-MP3-009)

# EVALUATION OF PROPOSED LICENSE AMENDMENT

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

Serial No. 07-0207 Docket Nos. 50-336, 50-423 ASME OM Code Reference Attachment 1 Page 1 of 9

# EVALUATION OF PROPOSED LICENSE AMENDMENT

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
- 3.0 TECHNICAL EVALATION
  - 3.1 Background
  - 3.2 Technical Analysis
- 4.0 REGULATORY EVALUATION
  - 4.1 Applicable Regulatory Requirements/Criteria
  - 4.2 Precedent
  - 4.3 Significant Hazards Consideration
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

## 1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) requests an amendment to Facility Operating Licenses DPR-65 and NPF-49 for Millstone Power Station Unit 2 (MPS2) and Unit 3 (MPS3), respectively. The proposed amendment will modify MPS2 and MPS3 Technical Specification (TS) 4.0.5 to reference the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) instead of Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code. Additionally the redundant requirement in TS 4.0.5 to maintain an ISI program is being proposed for removal based on duplicate regulatory requirements in 10 CFR 50.55a.

The proposed changes are consistent with implementation of the MPS2 fourth and MPS3 third ten year Inservice Testing (IST) program in accordance with the requirements of 10 CFR 50.55a(f), "Inservice testing requirements." The MPS2 fourth ten year IST interval and MPS3 third ten year IST interval begin on April 1, 2008.

The proposed amendment is based on NRC-approved Technical Specification Task Force (TSTF) Traveler TSTF-479-A, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a," and TSTF-497-A, Revision 0, "Limit Inservice Testing Program Application to Frequencies of 2 Years or Less."

To ensure MPS2 and MPS3 TS are in compliance with ASME code by the start of the next IST interval, DNC requests approval of the proposed amendment by February 1, 2008, with the amendment being implemented within 60 days of issuance.

### 2.0 DETAILED DESCRIPTION

The MPS2 and MPS3 Technical Specification (TS) 4.0.5 establishes the requirement that inservice inspection (ISI) of ASME Code Class 1, 2, and 3 components and inservice testing (IST) of ASME Code Class 1, 2, and 3 pumps and valves are performed in accordance with a periodically updated version of Section XI of the ASME B&PV Code and Addenda as required by 10 CFR 50.55a. TS 4.0.5 includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME B&PV Code. This clarification is provided to ensure consistency in surveillance intervals throughout the TS. Aside from minor punctuation differences, the wording of MPS2 and MPS3 TS 4.0.5 is identical.

TSTF-479-A (Reference 6.1) was developed to indicate that the IST program include testing frequencies applicable to the ASME OM Code which replaces the ASME B&PV Code as it relates to IST of pumps and valves. TSTF-479-A was approved as an administrative change by the NRC (Reference 6.2) and incorporated into Revision 3.1 of the improved standard Technical Specifications for Combustion Engineering (NUREG-1432) and Westinghouse (NUREG-1431) plants.

Serial No. 07-0207 Docket Nos. 50-336, 50-423 ASME OM Code Reference Attachment 1 Page 3 of 9

TSTF-497-A (Reference 6.3) was developed to provide an additional clarification that limits the provisions of surveillance requirement 3.0.2 (which permits a 25% extension of the interval specified in the frequency) to those IST frequencies specified as 2 years or less. TSTF-497-A was approved in an NRC safety evaluation (Reference 6.4) but is not yet incorporated into the improved standard TS. Surveillance requirement 3.0.2 is a reference to the industry standard provision in NUREG-1431 and NUREG-1432. MPS2 and MPS3 contain a similar provision in TS 4.0.2 which states "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance time interval."

The MPS2 and MPS3 proposed changes are in accordance with TSTF-479-A and TSTF-497-A except for the administrative differences of TS location (MPS Section 3.0/4.0 versus Administrative Section 5.0 in the NUREGs) and format.

To ensure consistency between the MPS2 and MPS3 proposed changes and those of the TSTFs discussed above, DNC is also proposing to remove the inservice inspection (ISI) program requirement and corresponding ASME B&PV Code referencing from TS 4.0.5. The NRC conducted a review of the Administrative Section 5.0 of the standard TS and concluded that provisions for the ISI program (and other programs) could be relocated to other licensee documents provided changes to the provisions are adequately controlled by other regulatory requirements (Reference 6.5). In its review the NRC also provided the justification that TS should not duplicate other regulatory requirements.

Corresponding TS Bases changes will be made in accordance with the respective unit's TS Bases Control Program and have not been included for information in this submittal due to the administrative nature of the changes.

### 3.0 TECHNICAL EVALUATION

### 3.1 Background

The background for the changes being proposed by this license amendment request is the same as the Background sections associated with TSTF-479-A and TSTF-497-A. One exception is that the application of provision 3.0.2, as it relates to IST frequencies in the improved standard TS, corresponds to the provision 4.0.2 in MPS2 and MPS3 TS that is quoted in the previous section. This difference is not considered to be technically significant.

## 3.2 Technical Analysis

## 3.2.1 ASME OM Code Reference Update

The technical analysis for the MPS2 and MPS3 proposed changes relating to IST activities are as specified in the Technical Analysis Sections of TSTF-479-A and TSTF-497-A. One exception is the application of provision 3.0.2 as it relates to IST frequencies in the improved standard TS corresponds to the provision 4.0.2 in MPS2 and MPS3 TS that is quoted in the previous section. This difference is not considered to be technically significant.

## 3.2.2 Removal of Referencing to ISI in TS 4.0.5

During review of MPS2 and MPS3 TS 4.0.5 for implementation of TSTF-479-A and TSTF-497-A, it was determined that the surveillance frequencies table headings in TS 4.0.5 should be clarified to indicate that the surveillance frequencies listed in the table are applicable to IST only. For that reason, reference to ISI activities is removed from the surveillance frequencies table headings. Likewise 4.0.5 c. and 4.0.5.d, which refer to the frequencies listed in the table, also propose removal of reference to ISI.

MPS2 and MPS3 are required by NRC regulation 10 CFR 50.55a(g)(4) to meet ISI requirements for ASME Code Class 1, 2, and 3 components set forth in Section XI of editions of the ASME B&PV Code and Addenda incorporated by reference in 10 CFR 50.55a(b). MPS2 and MPS3 maintain (and make necessary changes to) their respective ISI programs in accordance with approved station manuals and procedures as required by 10 CFR 50.55a(g). The current TS requirement in 4.0.5.a duplicates this regulation for ISI requirements and its deletion will not reduce MPS's commitment to the ISI program. Removal of ISI will not relieve MPS of its responsibility to seek relief from Code requirements when they are impractical nor will it eliminate any ISI activities not covered by 10 CFR 50.55a. Also, the current revisions (Rev. 3.1) of NUREG-1431 and NUREG-1432 do not contain a requirement to maintain an ISI program in accordance with 10 CFR 50.55a. Based on this discussion, removal of the ISI program from the MPS2 and MPS3 TS is determined to be an administrative change as these requirements are specified separately within the NRC's regulations.

The table below lists the surveillance requirements (SRs) that currently reference Technical Specification (TS) 4.0.5. No other referencing to TS 4.0.5 exists in the MPS2 or MPS3 TS. The context of each reference was reviewed and, with the exception of the snubbers TS, determined to be applicable to inservice testing requirements and not inservice inspection requirements. For the snubbers TS (MPS2 TS 4.7.8 and MPS3 TS 4.7.10), the reference to TS 4.0.5 will be changed to the Inservice Inspection Program. Deleting inservice inspection from the language in 4.0.5 will not impact any other TS.

| MPS2 TS      |   |  |
|--------------|---|--|
| 4.0.5        | Title of TS Section   | Applicable Component   |
| Referencing  |   |  |
| 4.4.2        | 3/4.4 REACTOR COOLANT SYSTEM  | pressurizer code safety valves   |
| 4.4.3.1      | 3/4.4 REACTOR COOLANT SYSTEM<br>3/4.4.3 RELIEF VALVES   | power operated relief valves   |
| 4.4.9.3.1    | 3/4.4 REACTOR COOLANT SYSTEM<br>3/4.4.9 PRESSURE TEMPERATURE<br>LIMITS, OVERPRESSURE PROTECTION<br>SYSTEMS            | power operated relief valves   |
| 4.5.2.c,d,&e | 3/4.5 EMERGENCY CORE COOLING<br>SYSTEMS 3/4.5.2 ECCS SUBSYSTEMS<br>- Tavg ≥ 300° F                                    | high pressure safety injection, low<br>pressure safety injection and<br>charging pumps |
| 4.6.2.1.1.b  | 3/4.6 CONTAINMENT SYSTEMS 3/4.6.2<br>DEPRESSURIZATION AND COOLING<br>SYSTEMS, CONTAINMENT SPRAYAND<br>COOLING SYSTEMS | containment spray pump   |
| 4.6.3.1      | 3/4.6 CONTAINMENT SYSTEMS 3/4.6.3<br>CONTAINMENT ISOLATION VALVES   | containment isolation valves   |
| 4.7.1.1      | 3/4.7 PLANT SYSTEMS 3/4.7.1 TURBINE<br>CYCLE, SAFETY VALVES   | main steam safety valves   |
| 4.7.1.2.b    | 3/4.7 PLANT SYSTEMS 3/4.7.1 TURBINE<br>CYCLE, AUXILIARY FEEDWATER<br>SYSTEM   | AFW pumps  |
| 4.7.1.5.2    | 3/4.7 PLANT SYSTEMS 3/4.7.1 TURBINE<br>CYCLE, MAIN STEAM ISOLATION<br>VALVES  | main steam isolation valves  |
| 4.7.8        | 3/4.7 PLANT SYSTEMS 3/4.7.8<br>SNUBBERS   | snubbers   |

| MPS3 TS<br>4.0.5<br>Referencing | Title of TS Section  | Applicable Component           |
|---------------------------------|--|--------------------------------|
| 4.4.2                           | 3/4.4 REACTOR COOLANT SYSTEM<br>3/4.4.2 SAFETY VALVES  | pressurizer code safety valves |
| 4.4.4.1                         | 3/4.4 REACTOR COOLANT SYSTEM<br>3/4.4.4 RELIEF VALVES  | power operated relief valves   |
| 4.4.6.2.2                       | 3/4.4 REACTOR COOLANT SYSTEM<br>3/4.4.6 REACTOR COOLANT SYSTEM<br>LEAKAGE, OPERATIONAL LEAKAGE               | RCS pressure isolation valve   |
| 4.4.9.3.2                       | 3/4.4 REACTOR COOLANT SYSTEM<br>3/4.4.9 PRESSURE TEMPERATURE<br>LIMITS, OVERPRESSURE PROTECTION<br>SYSTEMS   | RHR suction relief valve       |
| 4.5.2.f                         | 3/4.5 EMERGENCY CORE COOLING<br>SYSTEMS 3/4.5.2 ECCS SUBSYSTEMS<br>– Tavg GREATER THAN OR EQUAL TO<br>350° F | ECCS subsystem - pumps         |

| MPS3 TS<br>4.0.5<br>Referencing | Title of TS Section  | Applicable Component                               |
|---------------------------------|--|--|
| 4.6.2.1.b                       | 3/4.6 CONTAINMENT SYSTEMS 3/4.6.2<br>DEPRESSURIZATION AND COOLING<br>SYSTEMS, CONTAINMENT QUENCH<br>SPRAY SYSTEM | containment quench spray (QSS)<br>subsystem - pump |
| 4.6.2.2.b                       | 3/4.6 CONTAINMENT SYSTEMS 3/4.6.2<br>DEPRESSURIZATION AND COOLING<br>SYSTEMS, RECIRCULATION SPRAY<br>SYSTEM      | recirculation spray (RSS) pump                     |
| 4.6.3.3                         | 3/4.6 CONTAINMENT SYSTEMS 3/4.6.3<br>CONTAINMENT ISOLATION VALVES  | containment isolation valves                       |
| 4.7.1.1                         | 3/4.7 PLANT SYSTEMS 3/4.7.1 TURBINE<br>CYCLE, SAFETY VALVES  | main steam safety valves                           |
| 4.7.1.2.1.b                     | 3/4.7 PLANT SYSTEMS 3/4.7.1 TURBINE<br>CYCLE, AUXILIARY FEEDWATER<br>SYSTEM                                      | AFW pumps  |
| 4.7.1.5.2                       | 3/4.7 PLANT SYSTEMS 3/4.7.1 TURBINE<br>CYCLE, MAIN STEAM ISOLATION<br>VALVES                                     | main steam isolation valves                        |
| 4.7.10                          | 3/4.7 PLANT SYSTEMS 3/4.7.10<br>SNUBBERS   | snubbers   |

# 4.0 REGULATORY EVALUATION

## 4.1 Applicable Regulatory Requirements/Criteria

NRC regulation 10 CFR 50.55a defines the requirements for applying industry codes to each licensed nuclear powered facility. 10 CFR 50.55a(f)(4)(i) requires programs to perform inservice testing of certain ASME Code Class 1, 2, and 3 pumps and valves during the initial 120-month interval. The regulations require that programs be developed utilizing the latest edition and addenda incorporated into paragraph (b) of 10 CFR 50.55a on the date 12 months before the date of issuance of the operating license. Likewise, 10 CFR 50.55a(f)(4)(ii) requires licensees to comply with the requirements of the latest edition and addenda of the ASME OM code incorporated by reference in 10 CFR 50.55a(b) 12 months before the start of successive 120-month intervals. NRC regulation 10 CFR 50.55a(g)(4)(i) and (ii) provide similar requirements for the inservice inspection of ASME Code Class 1, 2, and 3 components.

## 4.2 <u>Precedent</u>

The NRC staff recently approved license amendments for Kewaunee Power Station on December 14, 2006 (TAC No. MD3055), Watts Bar Nuclear Plant Unit 1 on December 18, 2006 (TAC No. MD2380) and for Point Beach Nuclear Plant on June 8, 2006 (TAC No. MC8929). These precedents incorporated updating to the ASME OM Code and clarification of IST frequencies. The staff approved a license amendment for Surry

Serial No. 07-0207 Docket Nos. 50-336, 50-423 ASME OM Code Reference Attachment 1 Page 7 of 9

Power Station on July 15, 2005 (TAC Nos. MC5034 and MC5035) that included removing the ISI program from TS 4.0.5. The Surry license amendment also relocated IST requirements and replaced all referencing to 4.0.5 throughout the TS with that of the IST program. However, MPS has limited the scope of this proposed change to removal of ISI, due to the impact on other specifications and the need for NRC approval of the ASME Code update to support the start of the intervals.

## 4.3 Significant Hazards Consideration

The proposed change modifies the Millstone Power Station Unit 2 (MPS2) and Unit 3 (MPS3) Technical Specifications Surveillance Requirement 4.0.5 to replace the reference to Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code with a reference to ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) to be consistent with the requirements of 10 CFR 50.55a(f)(4). The proposed changes also clarify applicable inservice testing (IST) frequencies of ASME Code Class 1, 2, and 3, pumps and valves. Additionally, the proposed change removes a TS requirement to maintain an inservice inspection (ISI) program for ASME Code Class 1, 2, and 3 components in deference to the regulatory requirements in 10 CFR 50.55a(g) which duplicates the MPS2 and MPS3 TS requirement. Dominion Nuclear Connecticut, Inc. (DNC) has evaluated whether or not a significant hazards consideration is involved with the proposed changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change does not modify any plant equipment and does not impact any failure modes that could lead to an accident. Additionally, the proposed change has no effect on the consequence of any analyzed accident since the change does not affect the function of any equipment credited for accident mitigation. The proposed change incorporates revisions to the ASME Code that result in a net improvement in the measures for testing pumps and valves. Removing from TS the duplicate requirement in the regulations to maintain an ISI program in accordance with ASME codes and standards does not impact any accident initiators or analyzed events or mitigation of events. No reduction in previous commitments to 10 CFR 50.55a(g) are being proposed by this change.

Based on the discussion above, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Serial No. 07-0207 Docket Nos. 50-336, 50-423 ASME OM Code Reference Attachment 1 Page 8 of 9

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not involve a modification to the physical configuration of the plant (i.e., no new equipment will be installed) or adversely affect methods governing normal plant operation. The proposed change will not impose any new or different requirements or introduce a new accident initiator, accident precursor, or malfunction mechanism. The proposed change does not alter existing test criteria or frequencies. Additionally, there is no change in the types or increases in the amounts of any effluent that may be released off-site and there is no increase in individual or cumulative occupational exposure. The proposed changes incorporate revisions to the ASME Code that result in a net improvement in the measures for testing pumps and valves. Removal of the duplicate TS requirement to maintain an ISI program will not alter the commitment to the current ISI program requirements in 10 CFR 50.55a or any other TS requirements related to inservice inspection.

Based on the discussion above, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed change revises TS 4.0.5 regarding inservice testing of ASME Code Class 1, 2, and 3 pumps and valves, for consistency with the requirements of 10 CFR 50.55a(f)(4). The proposed change incorporates an administrative clarification to the frequencies for IST and incorporates revisions to the ASME Code that result in a net improvement in the measures for testing pumps and valves. No setpoints or safety limit settings are being revised. The safety function of the affected pumps and valves will continue to be confirmed through inspection and testing. Removal of the ISI program requirement from TS 4.0.5 does not remove the requirement from regulations, and therefore, will not diminish the current station approved programs and procedures that implement the regulatory criteria of 10 CFR 50.55a(g) to maintain an acceptable ISI program in accordance with the ASME Code.

Based on the discussion above, the proposed change does not involve a significant reduction in a margin of safety.

## 5.0 ENVIRONMENTAL CONSIDERATION

DNC has determined that the proposed amendment would change requirements with respect to use of a facility component located within the restricted area, as defined by 10 CFR 20, or it would change inspection or surveillance requirements. DNC has evaluated the proposed change and has determined that the change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released off site, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

### 6.0 **REFERENCES**

- 6.1 TSTF-479-A, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a," dated December 19, 2005.
- 6.2 USNRC letter from T. H. Boyce to members of the TSTF, "Status of TSTF 343, 479, 482, 485," dated December 6, 2005.
- 6.3 TSTF-497-A, Revision 0, "Limit Inservice Testing Program Application to Frequencies of 2 Years or Less," dated July 12, 2006.
- 6.4 USNRC letter from T. J. Kobetz to members of the TSTF, "Safety Evaluation TSTF 497 Limit Inservice Testing Program Application to Frequencies of 2 Years or Less," dated October 4, 2006.
- 6.5 USNRC letter from W. T. Russell to chairpersons of the TS Committee, "Content of Standard Technical Specifications, Section 5.0, Administrative Controls," dated October 25, 1993.

Serial No. 07-0207 Docket No. 50-336

ATTACHMENT 2

## PROPOSED TECHNICAL SPECIFICATIONS CHANGE ASME CODE REFERENCE UPDATE (LBDCR 07-MP2-014)

## MARKED-UP TECHNICAL SPECIFICATIONS PAGES

DOMINION NUCLEAR CONNECTICUT, INC. MILLSTONE POWER STATION UNIT 2

| SURVEILI                         | ANCE REQUIREMENTS (Continued)   |  |
|----------------------------------|---|--|
| 4.0.5<br>ASME Coc                | Surveillance Requirements for inservice in<br>le Class 1, 2 and 3 components shall be appli   | spection and testing of cable as follows:  |
| brmed in<br>ordance              | Inservice inspection of ASME Code Class 1,<br>and inservice testing ASME Code Class 1, 2<br>shall be performed in accordance with Sect<br>Boiler and Pressure Vessel Code and applic<br>by 10 CFR 50, Section 50/55a. | 2 and 3 components<br>, and 3 pumps and valves<br>ion XI of the ASME<br>able Addenda as required   |
| e for b.<br>ration<br>Maintenanc | Surveillance intervals specified in <del>Sectionand Pressure Vessel</del> Code and applicable Ad inspection and tosting activities required Pressure Vessel Code and applicable Addend                                | n XI of the ASME Bottor<br>denda for the inservice<br>by the ASMF Boiler and<br>ashall be applicable   |
| Nuclear Powe<br>its(ASME OM      | r las follows in these Technical Specificatio   | ns:  |
| (e)                              | ASME(Boiler and Pressure<br>SVessel Code and applicable Requ<br>Addenda terminology for perf<br>inservice inspection and ains<br>testing activities acti  | ired frequencies for<br>orming inservice<br><del>pection and</del> testing<br>vities   |
|                                  | WeeklyAt 1MonthlyAt 1Quarterly or every 3 monthsAt 1Semiannually or every 6 monthsAt 1Yearly or annuallyAt 1Biennially or every 2 yearsAt 1   | east once per 7 days<br>east once per 31 days<br>east once per 92 days<br>east once per 184 days<br>east once per 366 days<br>east once per 731 days |
| C                                | . The provisions of Specification 4.0.2 are required frequencies for performing inserv testing activities.  | applicable to the above<br>vice inspection and   |
| d                                | . Performance of the above inservice <del>inspect</del><br>shall be in addition to other specified Su   | <del>tion and</del> testing activities<br>rveillance Requirements.   |
| e                                | Nothing in the ASME Boiler and Pressure Vg<br>construed to supersede the requirements of<br>tion.   | ssel <sup>®</sup> Code shall be<br>f any Technical Specifica-  |
| La<br>S<br>+                     | nd to other normal and acc<br>pecified as 2 years or less i<br>esting program   | elerated frequencies<br>in the inservice   |
|                                  | •   |  |
|                                  | · .   |  |

4 4 4

MILLSTONE - UNIT 2

PLANT SYSTEMS

June 16, 1992 -

REVISED

#### 3/4.7.8 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

3.7.8 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

<u>APPLICABILITY</u>: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

#### ACTION:

With one or more snubbers inoperable within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8.d on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for the system.

#### SUBVETILANCE REQUIREMENTS

4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5: the Inservice Inspection Program.

a. <u>Inspection Types</u>

As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. <u>Visual Inspections</u>

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-3. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-3 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Amendment 160.

### c. <u>Visual Inspection Acceptance Criteria</u>

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type

MILLSTONE - UNIT 2

3/4 7-21

Amendment No. <del>11, 41, 52</del>, <del>96, 118</del>, 460

-Gorrected by letter-dated 8/26/92-

Serial No. 07-0207 Docket No. 50-423

**ATTACHMENT 3** 

## PROPOSED TECHNICAL SPECIFICATIONS CHANGE <u>ASME CODE REFERENCE UPDATE</u> (LBDCR 07-MP3-009)

# MARKED-UP TECHNICAL SPECIFICATIONS PAGES

DOMINION NUCLEAR CONNECTICUT, INC. MILLSTONE POWER STATION UNIT 3

### 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

### 3/4.0 APPLICABILITY

November 15, 2002 ----

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### LIMITING CONDITION FOR OPERATION

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of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified surveillance interval shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable Condition(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

performed in accordance with the 2b. Code for Operation? and Maintenancel of Mudear Power, Plants (ASME OM Code)

Inservice inspection of ASME Code Class 1, 2, and 3 components and Deleted inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a;

Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

Amendment No. \$4,

## APPLICABILITY

| LIMITING CONDITION FOR OPERATION (Continued)  |  | -November 15, 2002   |  |
|---|--|--|--|
| COM 3   |  |  |  |
| ASME <del>Boiler and Press</del><br>Code and applicable A<br>terminology for inser<br><del>Sinspection and</del> testin               | <del>ure Vessel A</del> Requ<br>Idenda perf<br>vice <del>Sinsp</del><br>g <u>activities acti</u> | ired frequencies for<br>orming inservice<br><del>ection-and</del> testing<br>vities  |  |
| Weekly<br>Monthly<br>Quarterly or every 3 m<br>Semiannually or every<br>Every 9 months<br>Yearly or annually<br>Biennially or every 2 | At 1<br>At 1<br>At 1<br>6 months<br>At 1<br>At 1<br>At 1<br>years<br>At 1                        | east once per 7 days<br>east once per 31 days<br>east once per 92 days<br>east once per 184 days<br>east once per 276 days<br>east once per 366 days<br>east once per 731 days |  |
| c. The provisions of Sp<br>required frequencies<br>activities;  | ecification 4.0.2 are<br>for performing inservic   | applicable to the above<br>e <del>inspection an</del> d testing  |  |
| d. Performance of the abo<br>shall be in addition<br>. and  | ove inservice <del>inspectio</del><br>to other specified Su                                      | nand testing activities<br>rveillance Requirements;  |  |
| e. Nothing in the ASME<br>construed to supers<br>Specification.   | Boiler and Pressure<br>ede the requirement   | <del>Vessel®</del> Code shall be<br>s of any Technical   |  |
| and to other normal a<br>specified as 2 years<br>program  | und accelerated .<br>or less in the w  | frequencies<br>nservice testing  |  |

Amendment No. \$4, \$7, 73, 138, 179, 213

PLANT SYSTEMS

#### 3/4.7.10 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

3.7.10 All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

<u>APPLICABILITY</u>: MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

#### ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.10g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of  $\frac{1}{2}$  specification 4.0.5. The Inservice Inspection Program.

a. <u>Inspection Types</u>

As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. <u>Visual Inspections</u>

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7-2. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7-2.

c. <u>Visual Inspection Acceptance Criteria</u>

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of

MILLSTONE - UNIT 3

3/4 7-22

Amendment No. 32, -62, -1