February 12, 2008

Mr. David A. Christian
President and Chief Nuclear Officer
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2 - ISSUANCE OF AMENDMENT RE: REVISION TO TECHNICAL SPECIFICATIONS PRESSURIZER POWER OPERATED RELIEF VALVE TESTING (TAC NO. MD6631)

Dear Mr. Christian:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 302 to Facility Operating License No. DPR-65 for the Millstone Power Station, Unit No. 2 (MPS2). This amendment consists of changes to the Technical Specifications (TS) in response to your application dated February 16, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML070510048).

The amendment modifies the MPS2 TS Surveillance Requirement 4.4.3.1c regarding testing of the pressurizer power operated relief valves (PORVs). In particular, the amendment removes the specific reference to bench testing in order to allow the PORVs to also be tested while installed in the system.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/ra/

John D. Hughey, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosures:
1. Amendment No. 302 to DPR-65
2. Safety Evaluation

cc w/encls: See next page

Millstone Power Station, Unit No. 2

cc:

Lillian M. Cuoco, Esquire
Senior Counsel
Dominion Resources Services, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

Edward L. Wilds, Jr., Ph.D.
Director, Division of Radiation
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

First Selectmen
Town of Waterford
15 Rope Ferry Road
Waterford, CT 06385

Charles Brinkman, Director
Washington Operations Nuclear Services
Westinghouse Electric Company
12300 Twinbrook Pkwy, Suite 330
Rockville, MD 20852

Senior Resident Inspector
Millstone Power Station
c/o U.S. Nuclear Regulatory Commission
P.O. Box 513
Niantic, CT 06357

Mr. J. Alan Price
Site Vice President
Dominion Nuclear Connecticut, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

Mr. J. W. "Bill" Sheehan
Co-Chair NEAC
19 Laurel Crest Drive
Waterford, CT 0638

Mr. Evan W. Woollacott
Co-Chair
Nuclear Energy Advisory Council
128 Terry's Plain Road
Simsbury, CT 06070

Ms. Nancy Burton
147 Cross Highway
Redding Ridge, CT 00870

Mr. Chris L. Funderburk
Director, Nuclear Licensing and
Operations Support
Dominion Resources Services, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Mr. William D. Bartron
Licensing Supervisor
Dominion Nuclear Connecticut, Inc.
Building 475, 5th Floor
Rope Ferry Road
Waterford, CT 06385

Mr. Joseph Roy,
Director of Operations
Massachusetts Municipal Wholesale
Electric Company
Moody Street
P.O. Box 426
Ludlow, MA 01056

Mr. David A. Sommers
Dominion Resources Services, Inc.
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

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Mr. David A. Christian
President and Chief Nuclear Officer
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

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Sincerely,
/ra/
John D. Hughey, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
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cc w/encls: See next page

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DOMINION NUCLEAR CONNECTICUT, INC.

DOCKET NO. 50-336

MILLSTONE POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 302
License No. DPR-65

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by the applicant dated February 16, 2007, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-65 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 302, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance, and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/ra/

Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the License
and Technical Specifications

Date of Issuance: February 12, 2008

ATTACHMENT TO LICENSE AMENDMENT NO. 302

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

Replace the following page of the Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove	Insert
Page 3	Page 3

Replace the following page of the Appendix A, Technical Specifications, with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove	Insert
3/4 4-3a	3/4 4-3a

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 302

TO FACILITY OPERATING LICENSE NOS. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

1.0 INTRODUCTION

By letter dated February 16, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML070510048) Dominion Nuclear Connecticut, Inc. (DNC), the licensee, submitted a request for changes to the Millstone Power Station, Unit No. 2 (MPS2) Technical Specifications (TS). The requested change would modify the MPS2 TS Surveillance Requirement 4.4.3.1c regarding testing of the pressurizer power operated relief valves (PORVs). In particular, the amendment removes the specific reference to bench testing in order to allow the PORVs to also be tested while installed in the system.

An individual notice of the Nuclear Regulatory Commission (NRC) staff's original proposed no significant hazards consideration determination was published in the *Federal Register* on November 19, 2007, (72 FR 65084). The repeat notice was published in the *Federal Register* on December 4, 2007, (72 FR 68220).

2.0 EVALUATION

2.1 Proposed TS Change

The NRC staff reviewed the license amendment request (LAR) to change MPS2 TS Surveillance Requirement (SR) 4.4.3.1c from:

"Once per 18 months the PORVs shall be bench tested at conditions representative of MODES 3 or 4."

to:

"Once per 18 months by operating the PORV through one complete cycle of full travel at conditions representative of MODES 3 or 4."

Enclosure

2.2 Regulatory Evaluation

Title 10 of the *Code of Federal Regulations*, Part 50, (10 CFR Part 50) Section 50.36(c)(2)(ii)(B), specifies that a TS limiting condition for operation (LCO) must be established for, among other things, each operating restriction that is an initial condition of a design-basis accident or transient analysis that either assumes failure of or presents a challenge to the integrity of a fission product barrier.

Section 50.36(c)(3) of 10 CFR Part 50 specifies that "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained..."

Together, these two provisions of 10 CFR Section 50.36 require that the surveillance practice contained in Surveillance Requirement 4.4.3.1c and the associated LCO 3.4.3 result in adequate assurance that PORV testing will support adequate demonstration of PORV operability. In addition, the NRC issued Generic Letter (GL) 90-06 on June 25, 1990, (ADAMS Accession No. ML03120416) to address PORV and block valve reliability.

2.3 Technical Evaluation

The NRC issued GL 90-06 on June 25, 1990, (ADAMS Accession No. ML031210416) which addressed, in part, Generic Issue 70, "Power Operated Relief Valve and Block Valve Reliability." Generic Issue 70 included upgrades in quality requirements, inservice testing requirements, and proposed technical specifications for all pressurized water reactor facilities that incorporate PORVs and block valves in their design. Enclosure A of GL 90-06 detailed NRC staff positions regarding Generic Issue 70 which included the addition of a surveillance requirement to the TS that required that each PORV be demonstrated OPERABLE at least once per 18 months by: "Operating the PORV through one complete cycle of full travel during MODES 3 or 4." Testing in MODE 3 or MODE 4 was specified in order to simulate the temperature and pressure environmental effects on PORVs.

The licensee proposed an alternative measure to testing the MPS2 PORVs during MODEs 3 or 4 in a letter dated January 11, 1993 (ADAMS Legacy Accession No. 9301220003). The licensee proposed that the MPS2 PORVs be bench tested at a qualified laboratory with the valve exposed to MODE 3 or MODE 4 conditions with proper reinstallation of the PORV being ensured and verified. This alternative was approved by the NRC staff with the issuance of TS Amendment 185 for MPS2 by letter dated February 15, 1995 (ADAMS Accession No. ML012920503).

The licensee's LAR dated February 16, 2007, requests that SR 4.4.3.1c be revised to allow in-situ testing as well as bench testing of the MPS2 PORVs. In-situ testing of the PORVs is consistent with the NRC staff position presented in Enclosure A of GL 90-06. In addition, the wording of the proposed SR 4.4.3.1c of, "operating the PORV through one complete cycle of full travel," reflects the text presented in GL 90-06 for the SR as well.

GL 90-06 also stipulates that PORV testing be conducted "during" MODEs 3 or 4, whereas the licensee's LAR dated February 16, 2007, retains the previously-approved alternative that the testing be conducted at conditions representative of MODEs 3 or 4. The licensee states in

Section 5.2 of the LAR that MPS2 conforms with the positions of GL 90-06 as documented in previous responses to the GL, including the letter dated January 11, 1993, to the NRC regarding bench testing of the PORVs. The proposed TS amendment adds the option of in-situ testing of the PORVs and associated block valves.

The licensee also states in Section 4.2 of the LAR that in-situ testing of the PORVs will normally be performed in MODEs 3 or 4. However, per Section 4.1 of the LAR, the licensee continues to rely on the NRC approval of TS Amendment No. 185 for MPS2 to allow for the flexibility to perform bench testing of the PORVs, as well as in-situ testing. Therefore, the licensee has retained the specific wording in SR 4.4.3.1c stipulating that testing will be conducted at conditions representative of MODEs 3 or 4 in order to retain the previously-approved alternative of bench testing the PORVs.

The licensee's LAR dated February 16, 2007, notes in Section 4.2 of Attachment 1 that PORV testing will be conducted with the associated block valve closed. The NRC staff has previously approved PORV testing with the block valve closed for the R. E. Ginna Nuclear Power Plant. Specifically, the NRC safety evaluation issued by letter dated June 21, 1995 (ADAMS Legacy No. 9507060092), found performance of the MODE 3 or MODE 4 PORV test with the associated block valve closed acceptable for the R. E. Ginna Nuclear Power Plant's response to GL 90-06. The NRC safety evaluation noted that GL 96-06 requirements that focus at improving PORV quality have been preempted by the Ginna safety-related design. Therefore, although testing the PORV with its associated block valve closed does not result in elevated pressure and flow conditions during the stroke test, Section 2.1.c(3) of the NRC safety evaluation states that testing the R. E.Ginna PORVs in this manner is justified since the PORVs valves are designed as safety-related. Thus, testing the PORV with the MODE 3 or 4 elevated temperature condition, without the associated pressure and flow conditions through the valves, is adequate verification of PORV and block valve reliability since the valves are designed and maintained as safety-related components. The NRC staff found this position acceptable as it is responsive to the intent of GL 90-06. The NRC safety evaluation also noted that testing in this manner avoided potential damage that may result from testing at full temperature and pressure conditions.

Revision 24 of the MPS2 final safety analysis report (FSAR) notes in Table 1.4 – 1 that the Reactor Coolant System pressurizer relief valves (i.e. the PORVs) are Class I components. Table 4.3 – 9 of the MPS2 FSAR identifies the PORV isolation valves as Class I components as well. Section 3.1 of the licensee's LAR dated February 16, 2007, also states that the PORVs are environmentally and seismically qualified and that the associated power supplies, electrical components and circuitry are safety-related. In addition, the Millstone 2 response to NRC GL 90-06 by letter dated December 21, 1990 (ADAMS Legacy No. 9012310123), Section 1.a of Attachment 2, stated that the MPS2 PORVs and block valves are all classified as Quality Assurance Category I, which subjects the valves to the most stringent requirements of the MPS2 Quality Assurance Program. Section 5.2 of the licensee's LAR dated February 16, 2007, states that MPS2 is complying with all the requirements of the subject December 21, 1990, letter. Thus, the MPS2 PORVs and associated block valves are designed and maintained as safety-related components. Therefore, the NRC staff finds that testing of the MPS2 PORVs with the associated block valves closed provides adequate verification of valve reliability and is acceptable.

The NRC staff finds that the licensee's proposed TS change to SR 4.4.3.1c to remove specific reference to bench testing and allow in-situ testing of the PORVs is in agreement with the specific testing methodology presented in GL 90-06. Furthermore, retention of the flexibility to perform bench testing of the PORVs is consistent with the NRC staff approved alternative as described in TS Amendment No. 185 for MPS2. Therefore, The NRC staff finds that the proposed TS change complies with the requirements of 10 CFR 50.36.

The NRC staff also notes that the licensee included information in the LAR regarding pre-installation stroke testing of the PORVs as well as post-maintenance retests of the PORVs. These activities are not TS controlled activities and are not relevant to the 18-month PORV testing addressed in SR 4.4.3.1c. Therefore, the NRC staff did not review, nor is any approval implied regarding, the pre-installation stroke testing or post-maintenance retests of the MPS2 PORVs as described in the licensee's LAR.

2.4 Summary

The NRC staff finds reasonable assurance that the proposed TS change to revise MPS2 TS SR 4.4.3.1c to allow in-situ testing, as well as bench testing, of the MPS2 PORVs complies with the Commission's regulations and will not endanger the health and safety of the public. The proposed PORV testing also complies with the NRC staff positions contained in GL 90-06 and previously-approved alternatives to those positions. Considering the justifications provided for the requested TS modification, the NRC staff finds the proposed TS change to be acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut State official was notified of the proposed issuance of the amendment. The State official commented on the differences between in-situ and bench testing with regard to data collection practices and inquired if in-situ testing, in this case, reduced public health and safety. NRC staff responded that in-situ testing does not reduce the public health and safety. Testing the valve in-place and recording and collecting data in the plant is an acceptable practice for testing PORVs. Removing the PORV and testing it in a laboratory requires additional vigilance to ensure that it is re-installed properly each time after testing.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes SRs. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards, and there has been no public comment on such finding (72 FR 65084). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Y. Huang
J. Hughey

Date: February 12, 2008