

March 3, 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, REQUEST FOR ADDITIONAL
INFORMATION FOR LICENSE AMENDMENT REQUEST REGARDING
DELETION OF SURVEILLANCE REQUIREMENT 4.5.2.e FROM THE
TECHNICAL SPECIFICATIONS (TAC NO. MD4837)

Dear Mr. Christian:

By letter dated February 20, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML070510599), Dominion Nuclear Connecticut, Inc., the licensee, submitted a request for changes to the Millstone Power Station, Unit No. 2 (MPS2) Technical Specifications (TS). The requested change would revise the MPS2 TS to eliminate Surveillance Requirement 4.5.2.e from the TS. The Nuclear Regulatory Commission staff has reviewed the request submitted by the licensee and has identified a need for additional information as set forth in the Enclosure.

The draft questions were sent to Mr. Bill Bartron, from your staff, to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed. On February 21, 2008, Mr. Bartron indicated that the licensee will submit a response by March 11, 2008. Please note that if you do not respond to this letter by the agreed-upon date or provide an acceptable alternate date in writing, we may reject your application for amendment under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108. If you have any questions, please contact John Hughey at (301) 415-3204.

Sincerely

/ra/

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

Docket Nos. 50-336

cc: See next page

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John D. Hughey, Project Manager
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ADAMS Accession Number: ML080570130 *via e-mail dated

OFFICE	LPL1-2/PM	LPL1-2/LA	LPL1-2/BC
NAME	JHughey	ABaxter * (JDH For)	HChernoff (w/comments)
DATE	03/03/2008	03/03/2008	03/03/2008

OFFICIAL RECORD COPY

Millstone Power Station, Unit No. 2

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REQUEST FOR ADDITIONAL INFORMATION
REGARDING LICENSE AMENDMENT REQUEST
TO DELETE SURVEILLANCE REQUIREMENT 4.5.2.E FROM
THE TECHNICAL SPECIFICATIONS
MILLSTONE POWER STATION, UNIT NO. 2
DOCKET NO. 50-336

By letter dated February 20, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML070510599), Dominion Nuclear Connecticut, Inc., the licensee, submitted a request for changes to the Millstone Power Station, Unit No. 2 (MPS2) Technical Specifications (TS). The requested change would revise the MPS2 TS to eliminate Surveillance Requirement (SR) 4.5.2.e from the TS.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed amendment and would like to discuss the following issues to clarify the submittal.

Background

The licensee's application dated February 20, 2007, makes the following statements that indicate that charging pump flow is not credited with mitigating any design basis accidents for MPS2:

- a) Section 5.1 of Attachment 1 to the application states in the response to question 1 of the "No Significant Hazards Consideration," that "[t]he FSAR [final safety analysis report] Chapter 14 accident analyses for MPS2 take no credit for the flow delivered by the charging pumps."
- b) Section 5.2 of Attachment 1 to the licensee's application states that "the function of the charging pumps no longer satisfy the requirements of 10 CFR 50.36(c)(2)(ii) and consequently are no longer required to be addressed under LCO [limiting condition for operation] 3.5.2."
- c) Section 5.2 of Attachment 1 to the licensee's application states that "[t]he proposed change to delete SR 4.5.2.e and thereby the requirement for an OPERABLE charging pump as part of an ECCS [emergency core cooling system] subsystem, does not involve any modification to, or change in method of operation of, any system, structure or component required for safe operation of the facility or mitigation of design basis accidents assumed in the facility safety analysis."

Enclosure

Based on NRC staff review of Chapter 14 of the MPS2 FSAR, and contrary to the above statements in the application, it appears that charging pump flow is credited in the MPS2 accident analyses. Specifically, with respect to an inadvertent opening of a pressurizer relief valve event, page 7 of FSAR Table 14.0.9-1, "Overview of Plant Systems and Equipment Available for Transient and Accident Conditions," lists the Charging and Safety Injection System as available equipment for this event. The asterisk note for Table 14.0.9-1 states, "All of the systems and equipment listed for an event would normally be available to mitigate the event consequences." In addition, the discussion for this event in FSAR, Section 14.6.1.6, states:

The charging and SISs have been shown to have sufficient capacity to easily compensate for the loss of primary coolant mass through the inadvertent opening of the pressurizer pressure relief valves. Therefore, the core is not expected to uncover during this event.

FSAR Tables 14.2.7-3 and 14.2.7-4 associated with this FSAR section list charging flow initiation as part of the sequence of events.

Also, Appendix 1A of the FSAR provides a discussion of the design of MPS2 as it relates to the General Design Criteria (GDC) shown in Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR). GDC 33, "Reactor coolant makeup," specifies, in part, that "[a] system to supply reactor coolant makeup for protection against small breaks shall be provided. The system safety function shall be to assure that specified acceptable fuel design limits are not exceeded as a result of reactor coolant loss due to leakage from the reactor coolant boundary and rupture of small piping or other small components which are part of the boundary." Appendix 1A, page 1.A-23, of the MPS2 FSAR states, in part, the following regarding GDC 33:

Reactor Coolant System (RCS) makeup during normal operation is provided by the Chemical and Volume Control System (CVCS) which includes three positive displacement charging pumps rated at 44 gpm [gallons per minute] each. Two operating CVCS pumps are capable of making up the flow loss for leaks in the reactor coolant boundary of up to 0.250 inches equivalent diameter. Two CVCS pumps are sufficient to makeup for a 0.250 inch equivalent diameter RCS break assuming either: 1) minimum letdown with no RCS leakage or 2) letdown isolated with maximum Technical Specification allowed leakage. This CVCS design results in a substantial RCS steady state pressure that is well above the shutoff head of the high pressure safety injection pumps. The above described CVCS capability fulfills the intent of Criterion 33.

Request for Additional Information

- 1) Provide an explanation for the apparent discrepancy between the three statements in the application cited above (items a, b, and c) and the information currently shown in the FSAR regarding whether the charging pumps are credited in mitigating any design basis accidents.
- 2) Item c cited above indicates that the proposed amendment does not involve any modification to any system, structure or component required for safe operation of the facility. However, the discussion in FSAR Appendix 1A, with respect to GDC 33, indicates that the charging pumps support the safety function to assure that specified

acceptable fuel design limits are not exceeded as a result of reactor coolant loss due to leakage from the reactor coolant boundary and rupture of small piping or other small components which are part of the boundary. Provide an explanation for the apparent discrepancy.