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March 26, 2008

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

Serial No.: 08-0047A  
NSSL/MAE R1  
Docket No.: 50-336  
License No.: DPR-65

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 2**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION ON THE USE OF**  
**ALTERNATIVE EXAMINATION TECHNIQUE OF SELECT CLASS 1 PIPING**  
**DISSIMILAR METAL WELDS (REQUEST NO. RR-89-64, TAC NO. MD6911)**

In a letter dated September 27, 2007, Dominion Nuclear Connecticut, Inc. (DNC) submitted Millstone Power Station Unit 2 Alternative Request RR-89-64. DNC requested Nuclear Regulatory Commission (NRC) approval of an alternative to use a limited, one-sided ultrasonic examination technique for eight 36-inch outside diameter welds. These welds are located on the reactor coolant system cold leg and are dissimilar metal welds with cast austenitic stainless steel safe ends that are welded with Alloy 82/182 material. On January 30, 2008, the NRC issued a request for additional information (RAI) containing nine questions related to the DNC request. DNC letter dated February 18, 2008 provided a response to the questions. Subsequently, the NRC issued an additional question on February 28, 2008. A response to the additional question is provided in the attachment to this letter. The response is consistent with the information discussed in a telephone conference with the NRC staff on March 10, 2008.

Should you have further questions, please contact Margaret Earle at (804) 273-2768.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Hartz", is written over the typed name.

Leslie Hartz  
Vice President – Nuclear Support Services

Commitments in this letter: None

Attachment

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

Mr. J. D. Hughey  
Project Manager - Millstone Power Station  
U.S. Nuclear Regulatory Commission  
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NRC Senior Resident Inspector  
Millstone Power Station

**ATTACHMENT**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION ON THE USE OF  
ALTERNATIVE EXAMINATION TECHNIQUE OF SELECT CLASS 1 PIPING DISSIMILAR  
METAL WELDS (REQUEST NO. RR-89-64, TAC NO. MD6911)**

**MILLSTONE POWER STATION UNIT 2  
DOMINION NUCLEAR CONNECTICUT, INC.**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION ON THE USE OF  
ALTERNATIVE EXAMINATION TECHNIQUE OF SELECT CLASS 1 PIPING  
DISSIMILAR METAL WELDS (REQUEST NO. RR-89-64, TAC NO. MD6911)**

**NRC QUESTION:**

In EPRI report IR-2007-277, EPRI provided estimated coverage for the 7 welds in Alternative Request RR-89-64 but not weld P-8-C-1. Please provide the estimated ultrasonic examination coverage for weld P-8-C-1.

**RESPONSE:**

The EPRI report does not contain field data for the specific nozzle P-8-C-1. Accordingly, the report does not include an estimate of the examination coverage expected to be obtained in 2R18 for the P-8-C-1 nozzle, or provide its photograph and detailed sketches of the weld profiles.

DNC performed a profile observation of the P-8-C-1 nozzle welds during refueling outage 2R17 in the fall of 2006 in planning for the use of this alternative examination. This profile observation was performed subsequent to commissioning of the EPRI report. Based upon the profile observation in 2R17, the component information of Table 3-1 in the EPRI report remains applicable to the P-8-C-1 nozzle. The design and weld profiles of the four inlet nozzles are comparable and Table 3-1 of the EPRI report that provides component information is also applicable to the P-8-C-1 nozzle. The assessment of estimated coverage shown by the report on the other three inlet nozzles P-4-C-1, P-13-C-1 and P-17-C-1 are representative of the capability of the examination technique to be used on the P-8-C-1 nozzle. DNC reviewed the available weld profiles of the P-8-C-1 nozzle and determined that coverage shown for the P-4-C-1 nozzle in the EPRI report can be applied as an estimate for the P-8-C-1 nozzle coverage assessment. Additionally, the observations and recommendations of Section 3.3 of the EPRI report remain applicable to the P-8-C-1 nozzle.