



July 16, 2008

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
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Serial No.: 08-0429  
NLOS/GAW: R0  
Docket No.: 50-423  
License No.: NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 3**  
**STRETCH POWER UPRATE LICENSE AMENDMENT REQUEST**  
**SUPPLEMENT TO DNC COMMENTS ON DRAFT SAFETY EVALUATION –**  
**STRETCH POWER UPRATE**

Dominion Nuclear Connecticut, Inc. (DNC) submitted a stretch power uprate license amendment request (LAR) for Millstone Power Station Unit 3 (MPS3) in letters dated July 13, 2007 (Serial Nos. 07-0450 and 07-0450A). On June 12, 2008, the NRC issued a draft safety evaluation (SE) report and requested that DNC provide comments regarding the proprietary content in the draft SE. The NRC's letter also permitted comments regarding the factual accuracy of the information in the SE. Subsequently, in a July 11, 2008 letter, the NRC indicated that the SE will not be issued until DNC provided a letter regarding the proprietary content of the NRC draft SE.

DNC's letter dated July 10, 2008 (Serial No. 08-0369) provided DNC's comments regarding factual accuracy of the draft SE. Although the draft SE was reviewed regarding the proprietary content, DNC's letter did not specifically address the proprietary content of the draft SE in the July 10, 2008 letter. This letter corrects that omission. DNC has not identified any proprietary information contained in the NRC draft SE.

Furthermore, four inaccuracies were identified in the attachment to the July 10, 2008 letter, on pages 25, 41, 42, and 43. Corrected pages are attached to this letter. Please replace pages 25, 41, 42, and 43 in their entirety in the July 10, 2008 attachment. We regret any confusion this may have caused.



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**ATTACHMENT**

**LICENSE AMENDMENT REQUEST**

**STRETCH POWER UPRATE LICENSE AMENDMENT REQUEST**  
**CORRECTED DNC COMMENTS ON DRAFT SAFETY EVALUATION REPORT**

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

Page	Location	Sentence	Comment
135	4 <sup>th</sup> paragraph in Technical Evaluation, second sentence	"However, the sequence of events (LR Table 2.8.5.1.2.2.1-1) lists low steam line pressure as the first safety injection signal."	Although the low steam line pressure setpoint is reached first, and it generates an SI signal (which initiates feedwater isolation), the analysis does not credit the initiation of SI flow until after the SI signal from low pressurizer pressure is generated at 25.8 seconds. This timing is reflected in the following comment.
135	5 <sup>th</sup> paragraph in Technical Evaluation, first sentence	"Although the safety injection system is actuated early in the transient (0.5 seconds) the minimum ..."	Per LR Table 2.8.5.1.2.2.1-1, the SI flow starts at 72.8 seconds.

On Page 219, Table 5, (page2 of 2):

Please replace the following Section:

CR ventilation timing for the LOCA, SGTR, MSLB, LRA and the REA:

T= 0 seconds	Normal CR unfiltered intake flow: 1595 cfm
T= 5 seconds	CBI signal generated
T= 10 seconds	CR isolates on radiation monitor signal Intake flow: 0 cfm; neutral condition Assumed unfiltered inleakage: 350 cfm
T= 1 minute, 5 seconds	delay for CREPS response (Not credited) Assumed unfiltered inleakage: 350 cfm
T=1 hour, 41 min, 5 sec (1.685 hours)	CREVS filtered intake flow: 230 cfm Assumed unfiltered inleakage: 100 cfm CREVS filtered recirculation flow: 666 cfm

With:

CR ventilation timing:

T=0 seconds	CR isolated on SI signal Intake flow: 0 cfm; neutral condition Assumed unfiltered inleakage: 350 cfm
T=1 minute	Delay for CREPS response (Not credited) Assumed unfiltered inleakage: 350 cfm
T=1 hour, 41 min (1.683 hours)	CREVS filtered intake flow: 230 cfm Assumed unfiltered inleakage: 100 cfm CREVS filtered recirculation flow: 666 cfm

The basis for the proposed change is contained in RAI Response to question AADB-07-0107, DNC letter dated January 18, 2008 (Serial No. 07-0846), Attachment 3, Page 5 of 106; Also stated correctly on page 212, first full paragraph of the draft SER.

On Page 221, Table 7 (Page 1 of 2)

Please replace the following Section:

**Table 7 (Page 1 of 2)**  
**MPS3 SPU Data and Assumptions for the SGTR Accident**

Primary-to-secondary leak rate TS limit LOOP	1 gpm (to unaffected SGs) Coincident with release
RCS TS iodine limit for normal operation	
Gross gamma	100 / E-Bar
Iodine	1.0 $\mu\text{Ci/gm DEI}$

With:

**Table 7 (Page 1 of 2)**  
**MPS3 SPU Data and Assumptions for the SGTR Accident**

Primary-to-secondary leak rate TS limit LOOP	150 gpd to any 1 SG Coincident with release
RCS TS iodine limit for normal operation	1.0 $\mu\text{Ci/gm DEI}$
RCS Gross Gamma activity	Equivalent to fuel failure associated with DEI limit

Basis:

The SGTR does not use the 100/E-bar LCO. Instead, as indicated in RAI Response to question AADB-07-0107, DNC

letter dated January 18, 2008 (Serial No. 07-0846), Attachment 2, Page 54 of 95, the gross gamma activity was based upon the more operationally limiting Dose Equivalent I-131 LCO. The discussion from Letter Serial No. 07-0846 Attachment 2, Page 54 of 95 is repeated below.

“Primary side iodine and gross gamma source concentrations are based on the more limiting Technical Specification limit of 1.0  $\mu\text{Ci/gm}$  Dose Equivalent (DEQ) I-131. The failed fuel equivalent associated with the iodine Technical Specification limit is 0.29%. The Technical Specification concentrations of the non-iodine isotopes at the 100/E-bar limit result in greater than 1 % failed fuel. Therefore the more limiting failed fuel percentage associated with the specific activity limit for the iodines is used for all primary coolant isotopes.”

On Page 223, Table 8, 4th item on the table:  
Please replace the following Section:

**Table 8 - MPS3 SPU Data and Assumptions for the MSLB Accident**

RCS volume	11,750 ft <sup>3</sup>
RCS mass	5.216E+05 lbm
Primary-to-secondary leak rate TS limit	1 gpm (to unaffected SGs)
RCS TS limit for normal operation	
Gross gamma	100/ E-Bar
Iodine	1.0 $\mu\text{Ci/gm}$ DEI

With:

**Table 8 - MPS3 SPU Data and Assumptions for the MSLB Accident**

RCS volume	11,750 ft <sup>3</sup>
RCS mass	5.216E+05 lbm
Primary-to-secondary leak rate TS limit	150 gpd to any 1 SG.
RCS TS iodine limit for normal operation	1.0 $\mu\text{Ci/gm}$ DEI
RCS Gross Gamma activity	Equivalent to fuel failure associated with DEI limit