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Dominion®

July 28, 2008

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Serial No.	08-0474
MPS LIC/GAW	R0
Docket Nos.	50-336
	50-423
License Nos.	DPR-65
	NPF-49

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION, UNIT NOS. 2 AND 3
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING CONTROL ROOM HABITABILITY PROGRAM AMENDMENT REQUEST
(TAC NOS. MD6115 AND MD6116)

On July 13, 2007, Dominion Nuclear Connecticut, Inc. (DNC) submitted a request for an amendment to the Technical Specifications (TSs) for Millstone Power Station Units 2 and 3 (MPS2 and MPS3) (Serial No. 07-0440). The proposed amendment would revise TS requirements related to control room envelope habitability consistent with the intent of NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-448, "Control Room Habitability," Revision 3. The NRC sent DNC requests for additional information (RAIs) in letters dated November 21, 2007 and January 28, 2008. DNC responded to these RAIs in letters dated December 7, 2007 (Serial No. 07-0790), March 5, 2008 (Serial No 08-0050), March 25, 2008 (Serial No. 08-0050A), June 9, 2008 (Serial No. 08-0050B), and June 26, 2008 (Serial No. 08-0050C).

In response to an additional RAI dated July 22, 2008, DNC is superceding proposed language previously submitted for MPS2 TS Section 6.27d. Specifically, the words "Not applicable due to neutral pressure CRE" are being replaced by "Licensee controlled programs will be used to verify the integrity of the CRE boundary. Conditions that generate relevant information from those programs will be entered into the corrective action process and shall be trended and used as part of the 36 month assessment of the CRE boundary in accordance with 6.27c(ii)."

Attachment 1 is DNCs response to the NRC RAI dated July 22, 2008. Attachment 2 contains the applicable marked up MPS2 TS Pages.

In support of the change to TS Section 6.27d, DNC is also proposing a change to the associated License Condition Regarding Initial Performance of New Surveillance and Assessment Requirements (Section 2.3 MPS2 (c)) included with the July 13, 2007 submittal (Serial No. 07-0440). Specifically, the words "Not applicable due to neutral pressure CRE" are being replaced by "The first performance of the periodic assessment of CRE habitability, TS 6.27d, shall be within 3 years, plus the 9 month allowance of SR 4.0.2, from the date of the last tracer gas test, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years."

Attachment 3 contains a mark-up of the revised License Condition for MPS2.

Additionally, as discussed in a teleconference between DNC and the NRC on July 14, 2008, DNC is amending a reference in MPS2 TS Bases 3/4.7.6 included as Insert J in the July 13, 2007 submittal (Serial No. 07-0440). Specifically, the DNC reference to Surveillance Requirement 4.7.6.1.e.3 is being changed to reference Surveillance Requirement 4.7.6.1.h. This change is consistent with the proposed TS changes related to CRE Habitability Program and is being provided for information only.

Attachment 4 contains a mark-up of the applicable MPS2 TS Bases for 3/4.7.6, for information only.

Should you have any further questions in regard to this submittal, please contact Mr. Geoffrey A. Wertz at (804) 273-3572.

Sincerely,

Gerald Bischof
Vice President – Nuclear Engineering

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 28th day of July, 2008.

My Commission Expires: August 31, 2008

Margaret B. Bennett
Notary Public

MARGARET B. BENNETT
Notary Public 354302
Commonwealth of Virginia
My Commission Expires Aug 31, 2008

Attachments: (4)

Attachment 1 - DNC Response to the RAI

Attachment 2 - Mark-up of the MPS2 TS Pages

Attachment 3 - Mark-up of the revised License Condition for MPS2

Attachment 4 - Mark-up of the applicable MPS2 TS Bases for 3/4.7.6.1, for information only.

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission
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ATTACHMENT 1

CONTROL ROOM HABITABILITY

DNC RESPONSE TO RAI

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

NRC Request for Additional Information

Dominion Nuclear Connecticut, Inc. (DNC) provided a supplement dated March 5, 2008, to its submittal dated July 13, 2007, (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML080660650 and ML071970463). In the response to NRC request for additional information question 1 (RAI 1), DNC stated that Millstone Power Station, Unit No. 2 (MPS2) conducts preventative maintenance and surveillance tests in lieu of a pressurization test to ensure that the MPS2 Control Room Envelope (CRE) boundary can perform its safety function. The response also noted that any criteria not met while performing these activities are documented and resolved in accordance with the MPS Corrective Action Program. The Nuclear Regulatory Commission (NRC) staff requests that the following information be provided in addition to the response provided to RAI 1 in the March 5, 2008, supplement.

NRC Question 1.a) How will the MPS2 Technical Specification (TS) 6.27 description of the Control Room Habitability Program and associated License Condition incorporate the corrective action program and associated trending into a periodic assessment of the MPS2 CRE boundary? (The proposed text for MPS2 TS 6.27.d does not contain this information.)

DNC Response 1.a) DNC is revising the proposed text for MPS 2 TS 6.27.d to identify that: "Licensee controlled programs will be used to verify the integrity of the CRE boundary. Conditions that generate relevant information from those programs will be entered into the corrective action process and shall be trended and used as part of the 36 month assessment of the CRE boundary in accordance with 6.27c(ii)."

NRC Question 1.b) At what frequency will the periodic assessment of the MPS2 CRE boundary integrity be performed? What is the basis for this frequency?

DNC Response 1.b) The periodic assessment will be performed at 36 month intervals in accordance with Reg. Guide 1.197, Revision 0, Sections C.1 and C.2.

ATTACHMENT 2

CONTROL ROOM HABITABILITY
RAI RESPONSE

MARK-UP OF THE MPS2 TECHNICAL SPECIFICATION PAGES

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

basis documents. The exceptions to the Regulatory Guides (RG) referenced in RG 1.196 (i.e., RG 1.52, RG 1.78, and RG 1.183), which were considered in completing the vulnerability assessments, are documented in the UFSAR/current licensing basis. Compliance with these RGs is consistent with the current licensing basis as described in the UFSAR and other licensing basis documents.

d. Not applicable due to neutral pressure CRE.

e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.

f. The provisions of Surveillance Requirement 4.0.2 are applicable to the frequencies for assessing CRE habitability and determining CRE unfiltered inleakage as required by paragraph c.

INSERT

d. Licensee controlled programs will be used to verify the integrity of the CRE boundary. Conditions that generate relevant information from those programs will be entered into the corrective action process and shall be trended and used as part of the 36 month assessment of the CRE boundary in accordance with 6.27c(ii).

ATTACHMENT 3

CONTROL ROOM HABITABILITY
RAI RESPONSE

MARK-UP OF THE REVISED LICENSE CONDITION FOR MPS2

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

(a) The first performance of SR 4.7.6.1.h, in accordance with TS 6.27.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 4.0.2, as measured from November 2, 2006, the date of the most recent successful tracer gas test, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.

(b) The first performance of the periodic assessment of CRE habitability, TS 6.27.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 4.0.2, as measured from November 2, 2006, the date of the most recent successful tracer gas test, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

(c) Not applicable due to neutral pressure CRE.

MPS3

Upon implementation of Amendment No. xxx adopting TSTF–448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 4.7.7.h, in accordance with TS 6.8.4.h.c.(i), the assessment of CRE habitability as required by TS 6.8.4.h.c.(ii), and the measurement of CRE pressure as required by TS 6.8.4.h.d, shall be considered met. Following implementation:

(a) The first performance of SR 4.7.7.h, in accordance with TS 6.8.4.h.c.(i), shall be within the specified Frequency of 6 years, plus the 18-month allowance of SR 4.0.2, as measured from June 16, 2004, the date of the most recent successful tracer gas test, as identified in the report referenced in the August 31, 2004 letter response to Generic Letter 2003–01, or within the next 18 months if the time period since the most recent successful tracer gas test is greater than 6 years.

(b) The first performance of the periodic assessment of CRE habitability, TS 6.8.4.h.c.(ii), shall be within 3 years, plus the 9-month allowance of SR 4.0.2, as measured from June 16, 2004, the date of the most recent successful tracer gas test, as identified in the report referenced in the August 31, 2004 letter response to Generic Letter 2003–01, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

(c) The first performance of the periodic measurement of CRE pressure, TS 6.8.4.h.d, shall be within 24 months, plus the 180 days allowed by SR 4.0.2, as measured from March 23, 2007, the date of the most recent successful pressure measurement test, or within 180 days if not performed previously.

3.0 Regulatory Analysis

3.1 No Significant Hazards Consideration

(c) The first performance of the periodic assessment of CRE habitability, TS 6.27.d, shall be within 3 years, plus the 9 month allowance of SR 4.0.2, from the date of the last tracer gas test, or within the next 9 months if the time period since the most recent successful tracer gas test is greater than 3 years.

ATTACHMENT 4

CONTROL ROOM HABITABILITY
RAI RESPONSE

MARK-UP OF THE APPLICABLE MPS2 TS BASES FOR 3/4.7.6.1

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

Millstone Power Station Unit 2
Technical Specification Bases 3/4.7.6
Control Room Emergency Ventilation System
Page B3/4 7-4c

Insert J

4.7.6.1.h

Surveillance Requirement 4.7.6.1.e.3 verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of DBA consequences is no more than 5 rem TEDE and the CRE occupants are protected from hazardous chemicals and smoke. This SR verifies that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of DBA consequences. When unfiltered air inleakage is greater than the assumed flow rate, ACTION c. must be entered. ACTION c. allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Compensatory measures are discussed in Regulatory Guide 1.196, which endorses, with exceptions, NEI 99-03. These compensatory measures may also be used as mitigating actions as required by ACTION c. Temporary analytical methods may also be used as compensatory measures to restore OPERABILITY. Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis DBA consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.