

September 30, 2008

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

Serial No 08-0585
NLOS/GAW R0
Docket Nos. 50-336
50-423
License Nos. DPR-65
NPF-49

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNITS 2 AND 3
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING
APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO
ADOPT TSTF-490, REVISION 0, "DELETION OF E BAR DEFINITION AND
REVISION TO RCS SPECIFIC ACTIVITY TECH SPEC"

On March 25, 2008, Dominion Nuclear Connecticut, Inc. (DNC) submitted a request for an amendment to the technical specifications (TS) for Millstone Power Station Units 2 and 3 (MPS2 and MPS3) (Serial No. 08-0135). The proposed amendment would replace the current TS 3.4.8 limit on reactor coolant system (RCS) gross specific activity with a new limit on RCS noble gas specific activity, consistent with the intent of NRC-approved Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF 490, Rev. 0, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec." The noble gas specific activity limit would be based on a new dose equivalent Xe-133 (DEX) definition that would replace the current E Bar average disintegration energy definition.

The NRC issued a request for additional information (RAI) on September 25, 2008, related to the non-applicability of Specification 3.0.4. The attachment to this letter contains DNC's response to the RAI.

The information provided in this letter does not affect the conclusion of the significant hazards consideration discussion provided in the March 25, 2008 DNC letter (Serial No. 08-0135).

Attachment: Response to Request for Additional Information - Application to Adopt TSTF-490, Rev. 0, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec"

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

Ms. C. J. Sanders
Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop O8-B3
Rockville, MD 20852-2738

NRC Senior Resident Inspector
Millstone Power Station

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

ATTACHMENT

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**APPLICATION TO ADOPT TSTF-490, REV. 0, "DELETION OF E BAR
DEFINITION AND REVISION TO RCS SPECIFIC ACTIVITY TECH SPEC"
(TAC NOS. MD8492 AND MD8493)**

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

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

**APPLICATION TO ADOPT TSTF-490, REV. 0, "DELETION OF E BAR
DEFINITION AND REVISION TO RCS SPECIFIC ACTIVITY TECH SPEC"
(TAC NOS. MD8492 AND MD8493)**

In reviewing the Dominion Nuclear Connecticut Inc. (DNC) license amendment request (LAR) dated March 25, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML080920781), regarding application for technical specification (TS) improvement to adopt Technical Specification Task Force (TSTF)-490, Rev. 0, "Deletion of E Bar Definition and Revision To RCS Specific Activity Tech Spec," for Millstone Power Station Units 2 and 3 (MPS2 and MPS3), the Nuclear Regulatory Commission (NRC) staff has determined that the following information is required in order to complete their review.

NRC Question 1:

The MPS2 TS limited condition of operation (LCO) 3.4.8 (page 3/4 4-13 of the MPS2 TS) currently includes non-applicability of Specification 3.0.4 in ACTION 'a' only. However, insert (Attachment 2 of the LAR) for MPS2 TS LCO 3.4.8 relocates the non-applicability Specification 3.0.4 to proposed ACTION steps 'b' as well as 'd.' Proposed ACTION step 'b' is equivalent to the current action step 'a.' Provide an explanation for stating, "Specification 3.0.4 is not applicable," in proposed MPS2 LCO 3.4.8 ACTIONS 'd.'

DNC Response:

A statement specifying the non-applicability of Specification 3.0.4 for proposed MPS2 LCO 3.4.8 ACTION d. is added to be consistent with the non-applicability statement in the proposed LCO 3.4.8 ACTION b. (currently ACTION a.). Consistent with NRC approved TSTF-490, Rev. 0, this exception to LCO 3.0.4 permits entry into the applicable MODE(S), relying on ACTION d. while the DOSE EQUIVALENT XE-133 LCO is not met. This exception is acceptable due to the significant conservatism incorporated into the RCS specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient-specific activity excursions while the plant remains at, or proceeds to, power operation.

The *non-applicability of Specification 3.0.4* is specified for MPS2, as opposed to the *applicability of LCO 3.0.4.c* which was specified in TSTF-490, Rev. 0, for Improved Technical Specifications (ITS) plants, due to the different structure of the TS. This is further explained below:

MPS2 Technical Specifications

- 3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in individual specifications.

As written, the MPS2 TS 3.0.4 requires a specific statement of non-applicability be included in the individual specification in order to permit entry into an OPERATIONAL MODE or condition relying upon the ACTION requirements. This is accomplished in MPS2 TS by including the following statement:

TS 3.0.4 is not applicable to this specification.

Improved Technical Specifications

- 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time,
 - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate, exceptions to this Specification are stated in the individual Specifications, or
 - c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

As written, ITS 3.0.4 requires a specific statement of applicability be included in the individual specification in order to permit entry into an OPERATION MODE or

condition relying upon the ACTIONS requirements. Since this applicability is for a parameter, this is accomplished in ITS by including the following statement:

-----NOTE-----
LCO 3.0.4.c is applicable.

The non-applicability statement in MPS2 does not introduce any non-conservatism in the changes proposed for MPS2. Because MPS2 has not adopted ITS, minor variations and/or deviations from TS changes described in TSTF-490, Rev. 0, are necessary to provide consistent terminology, format, and usage of the MPS2 TS. The allowance for the applicability of LCO 3.0.4.c stated in TSTF-490, Rev. 0, and the non-applicability of Specification 3.0.4 in the MPS2 TS, both permit entry into a MODE or other specified condition when an LCO is not met as discussed above.

NRC Question 2:

The current MPS3 TS LCO 3.4.8 ACTIONS 'a' and 'b' do not specify that "Specification 3.0.4 is not applicable." Provide an explanation for stating, "Specification 3.0.4 is not applicable," in proposed MPS3 LCO 3.4.8 ACTIONS 'b' and 'd.'

DNC Response:

A statement in ACTION b. indicates the provisions of LCO 3.0.4 are not applicable. Consistent with NRC approved TSTF-490, this exception to LCO 3.0.4 permits entry into the applicable MODE(S), relying on ACTIONS a. and b. while the DOSE EQUIVALENT I-131 LCO is not met. This exception is acceptable due to the significant conservatism incorporated into the RCS specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient-specific activity excursions while the plant remains at, or proceeds to, power operation.

Similarly, consistent with NRC approved TSTF-490, Rev. 0, a statement in ACTION d. indicates the provisions of LCO 3.0.4 are not applicable. This exception to LCO 3.0.4 permits entry into the applicable MODE(S), relying on ACTION d. while the DOSE EQUIVALENT XE-133 LCO is not met. This exception is acceptable due to the significant conservatism incorporated into the RCS specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient-specific activity excursions while the plant remains at, or proceeds to, power operation.

The *non-applicability of Specification 3.0.4* is specified for MPS3, as opposed to the *applicability of LCO 3.0.4.c* which was specified in TSTF-490, Rev. 0, for Improved Technical Specifications (ITS) plants due to the different structure of the TS. This is further explained below:

MPS3 Technical Specifications

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in individual specifications.

As written, the MPS3 TS 3.0.4 requires a specific statement of non-applicability be included in the individual specification in order to permit entry into an OPERATIONAL MODE or condition relying upon the ACTIONS requirements. This is accomplished in MPS3 TS by including the following statement:

TS 3.0.4 is not applicable to this specification.

Improved Technical Specifications

- 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time,
 - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate, exceptions to this Specification are stated in the individual Specifications, or
 - c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

As written, ITS 3.0.4 requires a specific statement of applicability be included in the individual specification in order to permit entry into an OPERATION MODE or condition relying upon the ACTIONS requirements. Since this applicability is for a parameter, this is accomplished in ITS by including the following statement.

-----NOTE-----
LCO 3.0.4.c is applicable.

The non-applicability statement in MPS3 does not introduce any non-conservatism in the changes proposed for MPS3. Because MPS3 has not adopted ITS, minor variations and/or deviations from TS changes described in TSTF-490, Rev. 0, are necessary to provide consistent terminology, format, and usage of the MPS3 TS. The allowance for the applicability of LCO 3.0.4.c stated in TSTF-490, Rev. 0, and the non-applicability of Specification 3.0.4 in the MPS3 TS, both permit entry into a MODE or other specified condition when an LCO is not met as discussed above.