



December 6, 2010

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

Serial No. 10-697
MPS Lic/GJC R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
REPLY TO A NOTICE OF VIOLATION EA 10-175,
INSPECTION REPORT 05000336/2010008

Pursuant to the provisions of 10 CFR 2.201, Dominion Nuclear Connecticut, Inc. (DNC) herein provides a reply to NRC letter dated November 5, 2010 regarding the Triennial Fire Protection Program Inspection of Millstone Power Station Unit 2 completed on September 22, 2010.

Enclosure 1 provides DNC's response to the violation of NRC requirements specified in the Notice of Violation EA 10-175. This enclosure provides: (1) the reason for the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

Enclosure 2 provides a list of commitments made in this letter for Notice of Violation EA 10-175.

If you have any questions or require additional information, please contact Mr. William D. Bartron at (860) 444-4301.

Sincerely,

Daniel G. Stoddard
Vice President Nuclear Operations

Enclosures: 1 – Reply to a Notice of Violation EA 10-175, Inspection Report
05000336/2010008
2 – List of NRC Commitments for Notice of Violation EA 10-175.

Commitments made in this letter:

1. See Enclosure 2 – List of NRC Commitments for Notice of Violation EA 10-175.

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

C. J. Sanders
Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 08B3
Rockville, MD 20852-2738

NRC Senior Resident Inspector
Millstone Power Station

Serial No. 10-697
Docket No. 50-336

ENCLOSURE 1

REPLY TO A NOTICE OF VIOLATION EA 10-175,
INSPECTION REPORT 05000336/2010008

MILLSTONE POWER STATION UNIT 2
DOMINION NUCLEAR CONNECTICUT, INC.

NOTICE OF VIOLATION

During an NRC inspection conducted July 19 through September 22, 2010, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

License Condition 2.C.(3) specifies, in part, Dominion shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report and as approved in the Safety Evaluation Report (SER) dated September 19, 1978, and a supplement dated July 17, 1990.

The Final Safety Analysis Report, Section 9.10.6 specifies that Dominion will meet the requirements of 10 CFR Part 50, Appendix R, Section III.G.2, which requires, in part, except as provided for in paragraph G.3 of this section, where cables or equipment, including associated non-safety circuits that could prevent operation or cause maloperation due to hot shorts, open circuits, or shorts to ground, of redundant trains of systems necessary to achieve and maintain hot shutdown conditions are located within the same fire area outside of primary containment, one of the means of ensuring that one of the redundant trains is free of fire damage shall be provided, per the requirements in G.2.a-G.2.f.

Contrary to the above, through September 22, 2010, Dominion failed to implement all provisions of the approved fire protection program as described in the Final Safety Analysis Report and as approved in the SER dated September 19, 1978, and a supplement dated July 17, 1990. Specifically, the safe shutdown strategy for Millstone Unit 2 relied upon unapproved manual operator actions to mitigate post-fire safe shutdown equipment malfunctions caused by a single spurious actuation, in lieu of protecting the equipment in accordance with 10 CFR Part 50 Appendix R, Section III.G.2, per the requirements in G.2.a-G.2.f. The use of manual actions in lieu of providing the required protection requires prior NRC approval. Dominion had not requested or received NRC approval for the use of manual actions affecting components that included the following: charging header containment isolation valve 2-CH-249, steam generator main steam isolation valves 2-MS-64A/B, steam generator blowdown control valves 2-MS-220A/B, charging system isolation valve 2-CH-192, auxiliary feedwater flow control valves 2-FW-43 A/B and turbine driven auxiliary feedwater pump 2-FW-P4.

This violation is associated with a Green Significance Determination Finding.

RESPONSE TO VIOLATION

Dominion Nuclear Connecticut does not contest this violation.

REASON FOR VIOLATION

Reliance was erroneously placed on previous determinations in addressing single spurious operations without the need of specific NRC exemption. DNC failed to recognize the regulatory significance and need to eliminate unapproved manual

operator actions for single spurious operations, as well as underestimated the actions needed to bring Millstone Power Station Unit 2 (MPS2) into compliance with the NRC's current expectations for operator manual actions relied upon during an Appendix R Fire. Specifically, DNC underestimated the actions necessary to meet Paragraph III.G.2, as defined in NRC Enforcement Guidance Memoranda 07-004 and 09-002, Regulatory Guide 1.189, Revision 2, and NUREG 1852.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Engineering reviewed the existing operator manual actions (OMAs), including the specific examples noted in the NOV, for feasibility and reliability of the operator actions. The time critical characteristics for each OMA were identified by review of the thermal hydraulic analysis for MPS2 and confirmed by operations procedure C OP 200.18 "Time Critical Action Validation and Verification". Each OMA was also reviewed to determine the fire area of concern. As a result, the applicable abnormal operating procedures (AOPs) were reviewed and it was confirmed the operators could perform the OMAs in the required timeframe.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Millstone Power Station Programs Group is coordinating a review of MPS2 OMAs. This review will identify credited OMAs and whether the action is for a "required" or an "important" flow path as defined in NEI 00-01, Revision 2. The associated circuits for the identified components will be reviewed for the fire areas where the action is necessary. The MPS2 thermal hydraulic analysis will be revised to formalize a sensitivity review which was performed in 2008. The revision of the thermal hydraulic analysis and formalization of the sensitivity review will ensure that OMA time requirements are current. The most critical time limits to perform the OMAs will then be identified.

For those OMAs which are associated with an "important" flow path, a review will be performed to validate that the action can be accomplished within the timeframe specified in the revised thermal hydraulic analysis. Corrections to these "important" flowpath OMAs will be made, as appropriate. Finally, for OMA's in the "required" flow path, an assessment will be made to identify which components require a NRC exemption request.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The resolution method for OMAs for components in the "required" flow path for MPS2 will be identified by January 21, 2011. Modifications to comply with 10 CFR Part 50 Appendix R Section III.G.2 are not anticipated at this time. Should modifications become necessary, they will be further reviewed to determine if the modification work can be completed with the plant online or during an outage. Any outage related work will be performed during 2R21, which is currently scheduled for the fall of 2012. Any non-outage related work will be expeditiously scheduled before the fall 2012 outage. Exemption requests to the requirements of 10 CFR Part 50 Appendix R Section III.G.2

will be submitted to the NRC by June 30, 2011. These exemption requests will meet the guidance set forth in NUREG 1852.

Full compliance will be achieved upon receipt of NRC approval of these exemption requests.

ENCLOSURE 2

**LIST OF NRC COMMITMENTS FOR
NOTICE OF VIOLATION EA 10-175**

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

List of NRC Commitments for Notice of Violation EA 10-175

The following table identifies those actions committed to by Dominion Nuclear Connecticut, Inc. (DNC) for Millstone Power Station Unit 2 (MPS2) in response to Notice of Violation EA 10-175. Any other statements in this response are provided for information and are not considered commitments.

Commitment	Due Date/Event
DNC commits to identifying the resolution method for operator manual actions (OMAs) for the "required" flow paths for MPS2.	January 21, 2011
Should modifications be necessary, DNC commits to complete work that can be completed with the plant online before the fall 2012 outage. Outage related work will be completed during 2R21.	Prior to the start-up following 2R21