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May 5, 2011

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

Serial No.	11-224
NSSL/WDC	R0
Docket No.	50-336
License No.	DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
REQUEST FOR ADDITIONAL INFORMATION REGARDING RELIEF REQUEST RR-04-04 USE OF ALTERNATIVE PRESSURE TESTING CRITERIA FOR THE SYSTEM LEAKAGE TEST CONDUCTED AT OR NEAR THE END OF THE INSPECTION INTERVAL ON CLASS 1 PIPING (TAC NO. ME4473)

Dominion Nuclear Connecticut, Inc. (DNC) submitted the Millstone Power Station Unit 2 (MPS2) fourth 10-year ISI program with associated proposed alternatives and relief requests in a letter dated July 29, 2010 and supplemental letter dated August 5, 2010. DNC requested the use of alternatives to certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI requirements. Included in the submittal was Relief Request RR-04-04, which requests alternative pressure testing criteria for three different Component Groups of Class 1 piping segments. In a letter dated April 20, 2011, the NRC transmitted a request for additional information (RAI). It was agreed DNC would respond to the RAI by May 6, 2011.

Attachment 1 provides DNC's response to the NRC RAI. In the response to Question 3, DNC concludes relief for the Component Group 2 segments portion of RR-04-04 is no longer required due to the subsequent acceptance of Code Case N-731 in Regulatory Guide 1.147. Therefore, this portion of the relief request is hereby withdrawn.

If you have any questions regarding this submittal, please contact Wanda Craft at (804) 273-4687.

Sincerely,

J. Alan Price
Vice President – Nuclear Engineering

Attachment:

1. Response to Request for Additional Information Regarding Relief Request RR-04-04 Use of Alternative Pressure Testing Criteria For The System Leakage Test Conducted At Or Near The End Of The Inspection Interval On Class 1 Piping

Commitments made in this letter:

1. None

cc: U.S. Nuclear Regulatory Commission
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ATTACHMENT 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING RELIEF REQUEST RR-04-04 USE OF ALTERNATIVE PRESSURE TESTING CRITERIA FOR THE SYSTEM LEAKAGE TEST CONDUCTED AT OR NEAR THE END OF THE INSPECTION INTERVAL ON CLASS 1 PIPING

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Question 1

The descriptions for piping segments M2-15 through M2-33 differ from those in the previous Relief Request dated August 17, 2006 (ADAMS Accession Number ML062400421). Piping segments M2-15 through M2-17 of the previous Relief Request are missing from the current Relief Request. Confirm the correct descriptions, Segment Boundaries and Component Groups for piping segments M2-15 through M2-33.

DNC Response

The piping associated with segments M2-15 through M2-17 of the previous relief request dated August 17, 2006 was permanently removed as part of a piping design modification, therefore, the segments are not included in the current Relief Request RR-04-04. Since previous piping segments M2-15 through M2-17 were removed, the sequence of segment numbering changed. Previous relief request segments M2-18 through M2-36 were re-numbered as M2-15 through M2-33 in Relief Request RR-04-04 and they reflect the correct descriptions, segment boundaries and component groups.

Question 2

Segment M2-14 of the current Relief Request, PZR [pressurizer] Relief Line Vent, has different Segment Boundaries (2-RC-050 to 2-RC-051) than it had in the previous Relief Request dated August 17, 2006, (2-RC-021 to 2-RC-421). Confirm the correct Segment Boundaries.

DNC Response

Segment M2-14 has undergone a piping design modification since the previous relief request. The modification replaced the previously listed boundary valves 2-RC-021 and 2-RC-421 with new valves 2-RC-050 and 2-RC-051. The segment M2-14 boundaries are listed correctly in Relief Request RR-04-04 as 2-RC-050 to 2-RC-051.

Question 3

Code Case N-731, "Alternative Class 1 System Leakage Test Pressure Requirements Section XI, Class 1," was accepted for use in Regulatory Guide 1.147, Revision 16, in October 2010. Do the Component Group 2 segments (LPSI headers) meet the requirements of Code Case N-731?

DNC Response

The Component Group 2 segments (LPSI headers) do meet the requirements of Code Case N-731. With Code Case N-731 now approved for use in Regulatory Guide 1.147, Revision 16, relief is no longer required for the Group 2 segments. Therefore, DNC is withdrawing the portion of Relief Request RR-04-04 for Component Group 2 segments.