



February 24, 2012

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

Serial No. 12-086  
NSSL/WDC R0  
Docket No. 50-336  
License No. DPR-65

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 2**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING**  
**LICENSE AMENDMENT REQUEST TO REVISE THE SNUBBER TECHNICAL**  
**SPECIFICATION SURVEILLANCE REQUIREMENTS (TAC NO. ME7221)**

By letter dated September 21, 2011, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2) to revise Technical Specification (TS) 3/4.7.8, Snubbers. The proposed amendment would revise the TS for snubbers to conform to the revised MPS2 inservice inspection program. In a letter dated February 9, 2012, the NRC transmitted a request for additional information (RAI) to DNC related to the LAR. DNC agreed to respond to the RAI by March 7, 2012.

Attachment 1 provides DNC's response to the NRC's RAI.

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

Sincerely,

  
for L. N. Hartz

L. N. Hartz  
Vice President – Nuclear Support Services

Attachment:

1. Response to Request for Additional Information Regarding License Amendment Request to Revise the Snubber Technical Specification Surveillance Requirements

Commitments made in this letter:

1. None

A001  
NRR

cc: U.S. Nuclear Regulatory Commission  
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**ATTACHMENT 1**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING  
LICENSE AMENDMENT REQUEST TO REVISE THE SNUBBER TECHNICAL  
SPECIFICATION SURVEILLANCE REQUIREMENTS**

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

By letter dated September 21, 2011, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2) to revise Technical Specification (TS) 3/4.7.8, Snubbers. The proposed amendment would revise the TS for snubbers to conform to the revised MPS2 inservice inspection (ISI) program. In a letter dated February 9, 2012, the NRC transmitted a request for additional information (RAI) to DNC related to the LAR. This attachment provides DNC's response to the NRC's RAI.

References:

1. *Dominion Nuclear Connecticut, Inc. (Dominion), letter to NRC, "Licensee Amendment Request (LAR) to Revise Snubber Surveillance Requirements," for Millstone Power Station, Unit 2, Docket No. 50-336, dated September 21, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11270A051).*
2. *Millstone Power Station Unit 2 (MPS2), Fourth 10-Year Interval Inservice (ISI) Inspection Program and Associated Proposed Alternatives and Relief Requests, July, 2010 (ADAMS Accession No. ML102580204).*
3. *Millstone Power Station Unit 2, Fourth 10-Year Interval Inservice Inspection Program, August 5, 2010 (ADAMS Accession No. ML102220527).*

*In Reference 1, Attachment 1, Page 1 of 7, Section 3.0, "Background", the first paragraph states that "MPS2 is currently in the fourth 10-year ISI interval. The fourth 10-year interval at MPS2 began on April 1, 2010 (References 2 and 3). Currently, snubber testing and examination are performed in accordance with the specific requirements of Technical Specification (TS) 3/4.7.8 and the requirements contained in American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), 2004 Edition." On Page 1-16, Section 1.8.25 and Page 2-34, Note 4, of References 2 and 3, it is noted that the snubber examination and testing of snubbers is performed in accordance with the 2004 Edition of the ASME OM Code, ISTD.*

**RAI 1:**

*Please state whether examination and testing of snubbers is performed per TS 3/4.7.8 and the ASME OM Code requirements as described in Reference 1 or only in accordance with ASME OM Code, ISTD requirements as noted in References 2 and 3. If MPS2 is performing examination and testing of snubbers per TS 3/4.7.8 and the ASME OM Code, please explain how Dominion is meeting both sets of requirements at MPS2.*

### **DNC Response**

MPS2 is currently meeting the requirements of both TS 3/4.7.8 and ASME OM Code, ISTD, 2004 Edition (ISTD).

Consistent with the guidance in NRC Regulatory Issue Summary 2010-06, "Inservice Inspection and Testing Requirements of Dynamic Restraints (Snubbers)," DNC submitted a LAR (Reference 1) to revise the TS for snubbers to conform to the requirements of ISTD, which is MPS2's code of record for the fourth 10-year ISI interval (References 2 and 3). Consequently, until the LAR is approved by the NRC, DNC has and will continue to meet the requirements of TS 3/4.7.8 and ISTD for examination and testing of snubbers.

During the first refueling outage in the fourth 10-year ISI interval (2R20), snubber testing was performed to the requirements of both the TS and ISTD. Comparison of the MPS2 TS and ISTD show that the snubber requirements are very similar, with some differences in snubber grouping and scope expansion. While the requirements of the TSs were met using existing surveillance procedures and work orders, the additional requirements of ISTD were addressed using newly created work orders. This will continue until approval of the LAR by the NRC.

### **RAI 2:**

*Attachment 5 of Reference 1 contains the MPS2 Snubber Program, Rev. 0, dated July 21, 2011. Please indicate what snubber program was being used at MPS2 from April 1, 2010 through July 21, 2011, and provide a copy of this snubber program, if it is different than Attachment 5.*

### **DNC Response**

From April 1, 2010 through July 21, 2011, the program plan for examination and testing of snubbers was delineated in the MPS2 Fourth 10-Year Interval ISI Program update (References 2 and 3). In the program update, DNC committed to the requirements of ISTD for examination and testing of snubbers. Until the TS is revised, DNC has and will continue to meet the requirements of both the TS and ISTD. Upon approval of the LAR, the snubber program provided in Attachment 5 of Reference 1 will be implemented.