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Dominion®

January 29, 2015

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

Serial No. 14-624
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 TECHNICAL SPECIFICATIONS TO ADOPT TSTF-426, "REVISE OR ADD ACTIONS TO PRECLUDE ENTRY INTO LCO 3.0.3 - RITSTF INITIATIVES 6B & 6C," (MF4417)

By letter dated June 30, 2014, Dominion Nuclear Connecticut, Inc. (DNC) submitted a License Amendment Request (LAR) for Millstone Power Station Unit 2. The LAR requests the adoption of approved Technical Specification Task Force (TSTF) traveler TSTF-426, Revision 5, "Revise or Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF Initiatives 6b and 6c," which is an approved change to the Standard Technical Specifications (STS). The proposed changes would replace required actions requiring either a default shutdown or explicit limiting condition for operation (LCO) 3.0.3 entry with a required action based on the risk significance for the system's degraded condition which varies from 8 to 24 hours.

In an email dated December 15, 2014, the Nuclear Regulatory Commission transmitted a request for additional information (RAI) related to the submittal. Attachment 1 to this letter provides DNC's response to the RAI. Attachment 2 provides revised marked-up Technical Specification pages.

If you have any questions or require additional information, please contact Wanda Craft at (804) 273-4687.

Sincerely,

Mark D. Sartain
Vice President – Nuclear Engineering

CRAIG D SLY
Notary Public
Commonwealth of Virginia
Reg. # 7518653
My Commission Expires December 31, 2016

COMMONWEALTH OF VIRGINIA)
)
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, 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 29th day of January, 2015.

My Commission Expires: December 31, 2016

Notary Public

A001
NRR

Commitments made in this letter: None

Attachments:

1. Response to Request for Additional Information Regarding License Amendment Request to Adopt TSTF-426, Revision 5, "Revise or Add Actions to Preclude Entry Into LCO 3.0.3 – RITSTF Initiatives 6b and 6c
2. Marked-up Technical Specification Pages 3/4 4-3 with Revised Insert A and 3/4 4-4 with Revised Insert A

cc: U.S. Nuclear Regulatory Commission
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Attachment 1

Response to Request for Additional Information Regarding License Amendment Request to Adopt TSTF-426, Revision 5, "Revise or Add Actions to Preclude Entry Into LCO 3.0.3 – RITSTF Initiatives 6b and 6c

Dominion Nuclear Connecticut, Inc.
Millstone Power Station Unit 2

Response to Request for Additional Information Regarding License Amendment Request to Adopt TSTF-426, Revision 5, "Revise or Add Actions to Preclude Entry Into LCO 3.0.3 – RITSTF Initiatives 6b and 6c

By letter dated June 30, 2014, Dominion Nuclear Connecticut, Inc. (DNC) submitted a License Amendment Request (LAR) for Millstone Power Station Unit 2 (MPS2). The LAR requests the adoption of approved Technical Specification Task Force (TSTF) traveler TSTF-426, Revision 5, "Revise or Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF Initiatives 6b and 6c," which is an approved change to the Standard Technical Specifications (STS). The proposed changes would replace required actions requiring either a default shutdown or explicit limited condition for operation (LCO) 3.0.3 entry with a required action based on the risk significance for the system's degraded condition which varies from 8 to 24 hours.

In an email dated December 15, 2014, the Nuclear Regulatory Commission (NRC) transmitted a request for additional information (RAI) related to the submittal. The response to the RAI is as follows:

Background

The Nuclear Regulatory Commission's regulatory requirements related to the content of the Technical Specifications are contained in Title 10 of the Code of Federal Regulations (10 CFR) 10 CFR 50.36. During the staff's review of the change to ensure that the change is in accordance with 10 CFR 50.36 the staff uses NRC guidance in NUREG-0800, Standard Review Plan, Chapter 16, Technical Specifications. According to this guidance the language in the proposed TS changes must be the same or equivalent to that in the current TS unless there is adequate technical or administrative reasoning supporting the change.

RAI 1

Technical Specification (TS) LCO 3.4.3 Action d is being separated into two actions d and e however the language as stated in new Action d is not the same as that is in the current TS. The language in New Required Action d.1 is "Place the associated PORV in manual control within 1 hour ..." The current TS language is "... prevent its associated PORV(s) from opening automatically." Please fully explain how the proposed language is equivalent to the language in the current TS.

DNC Response

Upon further review, DNC has decided to retain the original language used in the TS LCO 3.4.3 Action d which is reflected in the revised TS page provided in Attachment 2.

RAI 2

Current TS LCO 3.4.4 Action b currently applies when two (2) groups of pressurizer heaters are inoperable. In that action statement with the pressurizer otherwise inoperable the plant must "... be in at least HOT STANDBY ... within 6 hours and in HOT SHUTDOWN within the following 6 hours." If the proposed amendment is granted proposed TS LCO 3.4.4 Required Action c.1 would apply when 2 groups of pressurizer heaters are inoperable which requires at least one group of pressurizer heaters to be in OPERABLE status within 24 hours or "be in at least HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 12 hours." Please explain or provide an adequate basis for why 6 additional hours to be in HOT SHUTDOWN are included in proposed Required Action c.1 when compared to current Action b.

DNC Response

DNC mistakenly used the twelve hours in proposed Required Action c.1. Twelve hours is the number used in TSTF-426 for completion time of the required action. STS defines completion time as "The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTION Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO." However, the twelve hours is inclusive of the previous six hours in the required action. Thus, to have the MPS2 completion time be consistent with TSTF-426 and maintain the format of the MPS TS, the 12 hours used in the Required Action c.1 to HOT SHUTDOWN should be 6 hours.

Attachment 2 provides a revision to Insert A for the proposed mark-up of TS 3.4.4 to replace the Insert A previously submitted in DNC letter dated June 30, 2014.

Attachment 2

Marked-up Technical Specification Pages 3/4 4-3 with Revised Insert A and 3/4 4-4 with Revised Insert A

Dominion Nuclear Connecticut, Inc.
Millstone Power Station Unit 2

~~July 1, 1998~~

REACTOR COOLANT SYSTEM

RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.3 Both power operated relief valves (PORVs) and their associated block valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

Insert A to Page 3/4 4-3

ACTION:

~~a. With one or both PORVs inoperable and capable of being manually cycled, within 1 hour either restore the PORV(s) to OPERABLE status or close the associated block valve(s) with power maintained to the block valve(s)*, otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

~~b. With one PORV inoperable and not capable of being manually cycled, within 1 hour either restore the PORV to OPERABLE status or close its associated block valve and remove power from the block valve; restore the PORV to OPERABLE status within the following 72 hours or be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

~~c. With both PORVs inoperable and not capable of being manually cycled, within 1 hour either restore at least one PORV to OPERABLE status or close the associated block valves and remove power from the block valves and be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

~~d. With one or both block valves inoperable, within 1 hour restore the block valve(s) to OPERABLE status or prevent its associated PORV(s) from opening automatically. Restore at least one block valve to OPERABLE status within the next hour if both block valves are inoperable; restore any remaining inoperable block valve to OPERABLE status within 72 hours; otherwise be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

~~*~~ The block valve(s) may be stroked, as necessary, during plant cooldown to prevent thermal binding.

Insert A to page 3/4 4-3

Inoperable Equipment	Required ACTION
a. One or both PORVs, capable of being manually cycled.	a.1. Within 1 hour either restore the PORV(s) to OPERABLE status or close the associated block valve(s) with power maintained to the block valve(s)*; otherwise, be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
b. One PORV, not capable of being manually cycled.	b.1. Within 1 hour either restore the PORV to OPERABLE status or close its associated block valve and remove power from the block valve; restore the PORV to OPERABLE status within the following 72 hours or be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
c. ----------NOTE---------- Not applicable when a second PORV intentionally made inoperable. ---------- Two PORVs, not capable of being manually cycled.	c.1. Close the associated block valves within 1 hour or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. AND c.2. Remove power from associated block valves within 1 hour or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. AND c.3. Verify LCO 3.7.1.2, "Auxiliary Feedwater Pumps," is met within 1 hour or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. AND c.4. Restore at least one PORV to OPERABLE status within 8 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

d. One block valve.	d.1. Prevent its associated PORV from opening automatically within 1 hour, or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. AND d.2. Restore the block valve to OPERABLE status within 72 hours, or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
e. ----------NOTE---------- Not applicable when second block valve intentionally made inoperable ---------- Two block valves.	e.1. Verify LCO 3.7.1.2, "Auxiliary Feedwater Pumps," is met within 1 hour; or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. AND e.2. Restore at least one block valve to OPERABLE status within 8 hours, or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

~~January 30, 2007~~

REACTOR COOLANT SYSTEM

PRESSURIZER

LIMITING CONDITION FOR OPERATION

3.4.4 The pressurizer shall be OPERABLE with:

a. Pressurizer water level ≤ 70%, and

b. At least two groups of pressurizer heaters each having a capacity of at least 130 kW.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

Insert A to page 3/4 4-4

~~a. With only one group of pressurizer heaters OPERABLE, restore at least two groups to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.~~

~~b. With the pressurizer otherwise inoperable, be in at least HOT STANDBY with the reactor trip breakers open within 6 hours and in HOT SHUTDOWN within the following 6 hours.~~

SURVEILLANCE REQUIREMENTS

4.4.4.1 The pressurizer water level shall be determined to be within its limits at least once per 12 hours.

4.4.4.2 Verify at least two groups of pressurizer heaters each have a capacity of at least 130 kW at least once per 92 days.

Insert A to page 3/4 4-4

Inoperable Equipment	Required ACTION
a. Pressurizer water level not within limit.	a.1. Be in at least HOT STANDBY with the reactor trip breakers open within 6 hours and in HOT SHUTDOWN within the following 6 hours.
b. One group of pressurizer heaters.	b.1. Restore the inoperable group of pressurizer heaters to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 12 hours.
c. ----------NOTE---------- Not applicable when second group of required pressurizer heaters intentionally made inoperable. ---------- Two groups of pressurizer heaters.	c.1. Restore at least one group of pressurizer heaters to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 6 hours.