



August 27, 2015

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

Serial No. 15-431  
NSSL/MLC R0  
Docket No. 50-336  
License No. DPR-65

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 2**  
**SUPPLEMENT TO LICENSE AMENDMENT REQUEST TO RELOCATE TS**  
**SURVEILLANCE FREQUENCIES TO LICENSEE CONTROLLED PROGRAM IN**  
**ACCORDANCE WITH TSTF-425, REVISION 3**

By letter dated October 22, 2014, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2). In that letter, DNC proposed to modify the technical specifications (TSs) by relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk-Informed Technical Specification Task Force (RITSTF) Initiative 5b." Additionally, DNC proposed to add a new program, the Surveillance Frequency Control Program (SFCP), to TS Section 6, Administrative Controls. The proposed changes are consistent with NRC-approved Industry/TSTF Standard Technical Specifications (STS) change TSTF-425, Revision 3, (ADAMS Accession No. ML090850642). The Federal Register Notice published on July 6, 2009 (74 FR 31996), announced the availability of this TS improvement.

This supplement to the October 22, 2014 LAR revises the proposed change to Table 4.7-2, Item 1 for Gross Activity Determination which was recently identified by DNC to be incomplete.

Attachment 1 provides a description and assessment of the proposed change. Attachment 2 provides the revised markup for Table 4.7-2, Item 1, to replace the corresponding page previously submitted in the October 22, 2014 LAR.

Pursuant to the provisions of 10 CFR 50.92, the revised change proposed herein does not affect the conclusion of the Significant Hazards Consideration presented in the October 22, 2014 LAR.

DNC requests approval of the proposed amendment by October 22, 2015 with the amendment to be implemented within 90 days of NRC approval.

In accordance with 10 CFR 50.91(b), a copy of this LAR supplement is being provided to the State of Connecticut.

A001  
MLR

Should you have any questions in regard to this submittal, please contact Wanda Craft at (804) 273-4687.

Sincerely,



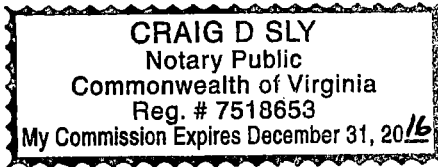
Gianna C. Clark  
Vice President – Nuclear Support Services

COMMONWEALTH OF VIRGINIA            )  
  )  
COUNTY OF HENRICO                    )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Gianna C. Clark who is Vice President – Nuclear Support Services of Dominion Nuclear Connecticut, Inc. She has affirmed before me that she 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 her knowledge and belief.

Acknowledged before me this 27<sup>th</sup> day of August, 2015.

My Commission Expires: 12/31/16

  
\_\_\_\_\_  
Notary Public

Attachments:

1. Description and Assessment of Proposed Change
2. Marked-up Technical Specification Change

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission  
Region I  
2100 Renaissance Blvd  
Suite 100  
King of Prussia, PA 19406-2713

R. V. Guzman  
Senior Project Manager – Millstone Power Station  
U.S. Nuclear Regulatory Commission  
One White Flint North, Mail Stop O8 C2  
11555 Rockville Pike  
Rockville, MD 20852-2738

NRC Senior Resident Inspector  
Millstone Power Station

Director, Radiation Division  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

**ATTACHMENT 1**

**Description and Assessment of Proposed Change**

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

## DESCRIPTION AND ASSESSMENT OF PROPOSED CHANGE

### 1.0 SUMMARY

By letter dated October 22, 2014, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2) (Reference 1). In that letter, DNC proposed to modify the technical specifications (TSs) by relocating specific surveillance frequencies to a licensee-controlled program with the adoption of Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk-Informed Technical Specification Task Force (RITSTF) Initiative 5b." Additionally, DNC proposed to add a new program, the Surveillance Frequency Control Program (SFCP), to TS Section 6, Administrative Controls. The proposed changes are consistent with NRC-approved Industry/TSTF Standard Technical Specifications (STS) change TSTF-425, Revision 3, (ADAMS Accession No. ML090850642). The Federal Register Notice published on July 6, 2009 (74 FR 31996), announced the availability of this TS improvement.

This supplement to the October 22, 2014 LAR revises the proposed change to Table 4.7-2, Item 1 for gross activity determination which was recently identified by DNC to be incomplete.

### 2.0 DESCRIPTION OF CHANGE

In the October 22, 2014 LAR, DNC proposed to delete the surveillance frequency specified in Table 4.7-2, Item 1, Gross Activity Determination, and replace it with "At the frequency specified in the Surveillance Frequency Control Program." The surveillance frequency was marked-up as shown below.

- |                                 |   |
|---------------------------------|---|
| 1. Gross Activity Determination | <del>3 times per 7 days</del> At the frequency specified in the Surveillance Frequency Control Program with a maximum time of 72 hours between samples. |
|---------------------------------|---|

DNC proposes to revise this change as follows:

- |                                 |  |
|---------------------------------|--|
| 1. Gross Activity Determination | <del>3 times per 7 days with a maximum time of 72 hours between samples.</del> At the frequency specified in the Surveillance Frequency Control Program. |
|---------------------------------|--|

The marked-up TS page for this revised change is provided in Attachment 2. The additional markups shown on this page were proposed changes from the October 22, 2014 LAR and are not being changed.

### **3.0 TECHNICAL EVALUATION OF CHANGE**

The proposed change to TS Table 4.7-2, Item 1, Gross Activity Determination, is being revised to include relocation of the words "with a maximum time of 72 hours between samples" to the surveillance frequency control program (SFCP). DNC has identified that this statement relates to the surveillance frequency for gross activity determination and should have been proposed for relocation to the SFCP in the October 22, 2014 LAR.

Due to the custom nature of the MPS2 TSs, an equivalent surveillance for gross activity determination does not exist in the standard TSs for Combustion Engineering plants (i.e. NUREG-1432). For this MPS2 plant-specific surveillance, which is not included in the NUREG-1432 markups provided in TSTF-425, DNC determined that since this surveillance involves a fixed periodic frequency, relocation of this surveillance frequency is consistent with TSTF-425, Revision 3, and with the NRC's model safety evaluation dated July 6, 2009 (74 FR 31996), including the scope exclusions identified in Section 1.0, "Introduction," of the model safety evaluation.

This revised change is consistent with the proposed change recently approved by the NRC for St. Lucie Units 1 and 2 on June 22, 2015 (Reference 2).

Since the MPS2 TSs are custom TSs, the applicable surveillance requirements and associated TS Bases numbers differ from the STSs presented in NUREG-1432 and TSTF-425, but with no impact on the NRC staff's model safety evaluation dated July 6, 2009 (74 FR 31996).

In accordance with TSTF-425, changes to the frequencies for these surveillances would be controlled under the SFCP.

### **4.0 REFERENCES**

1. DNC Letter dated October 22, 2014, Millstone Power Station Unit 2, License Amendment Request to Relocate TS Surveillance Frequencies to Licensee Controlled Program in Accordance with TSTF-425, Rev. 3 (ADAMS Accession No. ML14301A112).
2. St. Lucie Plant, Unit Nos. 1 and 2 – Issuance of Amendments Regarding Risk-Informed Justifications for the Relocation of Specific Surveillance Frequency Requirements to a Licensee-Controlled Program (TAC Nos. MF3495 and MF3496), dated June 22, 2015 (ADAMS Accession No. ML15127A066).

**ATTACHMENT 2**

**Marked-up Technical Specification Change**

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

~~August 2, 1985~~

**TABLE 4.7-2**

**SECONDARY COOLANT SYSTEM SPECIFIC ACTIVITY  
SAMPLE AND ANALYSIS PROGRAM**

<u>TYPE OF MEASUREMENT AND ANALYSIS</u>	<u>MINIMUM FREQUENCY</u>
1. Gross Activity Determination	<del>3 times per 7 days with a maximum time of 72 hours between samples.</del>
2. Isotopic Analysis for DOSE EQUIVALENT I-131 Concentration	a) 1 per 31 days, whenever the gross activity determination indicates iodine concentrations greater than 10% of the allowable limit  b) <del>1 per 6 months,</del> whenever the gross activity determination indicates iodine concentrations below 10% of the allowable limit.

At the frequency specified in the Surveillance Frequency Control Program