From: Guzman, Richard
Sent: Wednesday, February 24, 2016 11:24 AM
To: 'wanda.d.craft@dom.com'
Subject: REQUEST FOR ADDITIONAL INFORMATION (NRC staff 10 CFR 50.36 review) - MPS3 LAR to Adopt Dominion Core Design and Safety Analysis Methods (MF6251)

Categories: Followup

Wanda,

The NRC staff has reviewed the proposed TS changes in accordance with 10 CFR 50.36 related to the subject license amendment request dated May 8, 2015 (ADAMS Accession No. ML15134A244), and has determined that additional information is needed to complete its review. Shown below are the NRC staff's request for additional information questions. Please provide your formal response by March 31, 2016. If you have any questions, please contact me.

Thanks,

Rich Guzman
Sr. Project Manager
NRR/DORL
US NRC
301-415-1030

REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST TO ADOPT DOMINION CORE DESIGN AND ANALYSIS METHODS AND TO ADDRESS ISSUES IDENTIFIED IN WESTINGHOUSE DOCUMENTS NSAL-09-5, REV. 1, NSAL-15-1, AND 06-IC-03

DOMINION NUCLEAR CONNECTICUT, INC.

MILLSTONE POWER STATION, UNIT 3

DOCKET NUMBER 50-410

CAC NO. MF6251

By letter dated May 8, 2015, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15134A244), Dominion Nuclear Connecticut, Inc., submitted a license amendment request (LAR) which proposed changes to the Technical Specifications (TSs) for Millstone Power Station, Unit 3 (MPS3). Specifically, the licensee proposed to adopt Nuclear Regulatory Commission (NRC)-approved Dominion core design and safety analysis methodologies to MPS3.

The NRC's regulatory requirements related to the content of the TS Limiting Conditions for Operation (LCOs) and Surveillance Requirements are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) 10 CFR 50.36(c)(2) and 10 CFR 50.36(c)(3), respectively.

During the NRC staff's review of proposed TS changes in accordance with 10 CFR 50.36, the staff uses NUREG-0800, Standard Review Plan, Chapter 16, TSs; NUREG-1431, Standard TS, Westinghouse Plants, Rev. 4; and the approved TSTF as guidance. According to this guidance, the language in the proposed TS changes must be the same or equivalent to that in the current TS (CTS) unless there is adequate technical or administrative reasoning supporting the change.

RAI #1

New proposed Action b in insert A to LCO 3.2.2.1, Action b, proposes a 4-hour Completion Time (CT) to reduce thermal power until the heat flux hot channel factor $F_Q(Z)$ is within its limits. What is the technical basis for a completion time of 4 hours instead of the 15-minute completion time in LCO 3.2.2.1, Action a(1)? No technical basis was provided in the CTS or the LAR to support this CT. Please provide the technical justification.

RAI #2

New proposed Action c in insert A to LCO 3.2.2.1, Action b, proposes a 72-hour CT to reduce the power range neutron flux – high trip setpoints by 1% for each 1% that the thermal power level is reduced. What is the technical basis for a 72-hour CT to adjust the power range neutron flux – high trip setpoints instead of the 4-hour CT allowed elsewhere in CTS (e.g., existing LCO 3.2.1.1 Action a.2 or LCO 3.2.2.1, Action a(1))? Please provide the technical justification.

Additionally, please consider submitting a revised insert A, renumbering all the proposed actions in proposed insert A to LCO 3.2.2.1, Action b, using numerals instead of letters. This may better fit the outline format of MPS3 CTS to avoid confusion. The actions of insert A would actually be sub-actions to an Action b in CTS.

RAI #3

The NRC staff finds that the proposed extension of time to complete the precision flow balance in SR 4.2.3.1.3.a from 24 hours to 7 days is not consistent with the existing guidance in NUREG-1431, Revision 4 which specifies 24 hours. NUREG-1431, Rev. 4, LCO 3.4.1 bases explain that the result is used to calibrate the RCS flow rate indicators. Please explain any operational ramifications of the extended completion time. For example, would the licensee remain at 90% power for the proposed 7 day time period? If not, address how the licensee would account for any potential non-conservatism that may exist in the flow rate indicators.