

From: Semancik, Jeffrey <Jeffrey.Semancik@ct.gov>
Sent: Thursday, January 19, 2017 2:58 PM
To: Guzman, Richard
Cc: Tift, Doug
Subject: [External_Sender] RE: Planned Issuance of Millstone Unit 2 License Amendment re: Surveillance Requirement 4.1.3.1.2 for CEA 39 (MF8935)

Categories: Action

Richard,

I do have a few comments/questions:

1. Millstone 2 surveillance frequencies, including SR 4.1.3.1.2 are controlled by TS Surveillance Control Program. Is there a reason that this change, a de facto surveillance frequency change, is not being evaluated under this program?
2. Dominion's NSHC response to question 1 states, "CEA 39 was demonstrated to be moveable and trippable during the last performance of SR 4.1.3.1.2. Since the functionality of CEA 39 has not been affected..." The purpose of SR 4.1.3.1.2 is to determine if there are any conditions that have resulted in mechanical binding of the CEA. Dominion has not (see 1) determined that the surveillance interval can be extended; therefore, it is not clear to me how they can justify that the rod remains operable without performing the required surveillance within the specified surveillance interval. (TS 4.0.1) What is the basis for assuming the rod remains operable for a period beyond the surveillance interval? Does Dominion have rod failure data? How have they justified that end of cycle failure mechanisms such as thermally induced twisting/bowing are not present? Is there predictive data that indicates other signs of mechanical bowing? In short, the assessment provided seems to focus on why the UGC condition does not affect trippability but does not address basis for assuming that the CEA is not affected by other unrelated mechanisms beyond the analyzed surveillance interval.
3. How is the UGC being maintained de-energized? Does this method require any actions outside the control room to re-energize in order to move rods or can the LGC perform this function alone? If so, does this affect any TCOAs for an ATWS or other events requiring rapid manual insertion of control rods? I did not see this addressed under Administrative Controls.

I would appreciate a phone call to discuss in addition any email response.

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From: Guzman, Richard [<mailto:Richard.Guzman@nrc.gov>]
Sent: Thursday, January 19, 2017 7:30 AM
To: Semancik, Jeffrey
Subject: Planned Issuance of Millstone Unit 2 License Amendment re: Surveillance Requirement 4.1.3.1.2 for CEA 39 (MF8935)

Good Morning,

The NRC staff is preparing to issue the following license amendment related to Millstone Power Station, Unit 2. A brief description of the license amendment request (LAR) is provided below. Additional information can be found in the licensee's submittal which is also referenced below by ADAMS Accession number.

Please let me know if you have any comments or questions regarding this licensing action by January 26. My current projection for issuance of the amendment is by the 1st week of February.

Millstone Power Station, Unit 2 (MPS2), License Amendment Request re: Surveillance Requirement 4.1.3.1.2 for Control Element Assembly 39 (CAC No. MF8935)

Application date: December 14, 2016 (ADAMS Accession No. ML16354A424)

Brief Description of LAR: The amendment would revise the MPS2 Technical Specifications (TSs) for MPS2 by adding a note to TS Surveillance Requirement (SR) 4.1.3.1.2, control element assembly (CEA) freedom of movement surveillance, such that CEA 39 may be excluded from the remaining quarterly performance of the SR in Cycle 24. The amendment would allow the licensee to delay exercising CEA 39 until after repairs can be made during the next outage.

The LAR was published in the Federal Register (FR) on January 3, 2017 (82 FR 157) <https://www.gpo.gov/fdsys/pkg/FR-2017-01-03/pdf/2016-31813.pdf>. To date, no comments have been received.

Thanks,
Rich

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Rich Guzman  
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