UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 21, 2019

Mr. Daniel G. Stoddard
Senior Vice President and
Chief Nuclear Officer
Dominion Nuclear
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 3 – ISSUANCE OF AMENDMENT NO. 272 REGARDING REVISIONS TO TECHNICAL SPECIFICATIONS ACTION STATEMENT FOR LOSS OF CONTROL BUILDING INLET VENTILATION RADIATION MONITOR INSTRUMENTATION CHANNELS (EPID L-2018-LLA-0099)

Dear Mr. Stoddard:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 272 to Renewed Facility Operating License No. NPF-49 for Millstone Power Station, Unit No. 3 (Millstone 3), in response to your application dated April 4, 2018, as supplemented by letter dated October 22, 2018.

The amendment revises ACTION 18 in Technical Specifications Table 3.3-3, Functional Unit 7.e, "Control Building Inlet Ventilation Radiation," for Millstone 3 to allow continued fuel handling and reactor operation with inoperable inlet radiation monitoring instrumentation, provided that one train of the control room emergency ventilation system is operating in the emergency mode. The technical specification change specifies that one train of the control room emergency ventilation system be placed in the emergency mode of operation within 7 days if one radiation monitor channel is inoperable, or immediately, if both radiation monitor channels are inoperable.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Richard V. Guzman, Senior Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosures:
1. Amendment No. 272 to NPF-49
2. Safety Evaluation

cc: Listserv

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DOMINION ENERGY NUCLEAR CONNECTICUT, INC., ET AL

DOCKET NO. 50-423

MILLSTONE POWER STATION, UNIT NO. 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 272
Renewed License No. NPF-49

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Dominion Energy Nuclear Connecticut, Inc. (the licensee) dated April 4, 2018, as supplemented on October 22, 2018, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-49 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, revised through Amendment No. 272 and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto are hereby incorporated into the license. DENC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance, and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

James G. Danna, Chief
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: March 21, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 272

MILLSTONE POWER STATION, UNIT NO. 3

RENEWED FACILITY OPERATING LICENSE NO. NPF-49

DOCKET NO. 50-423

Replace the following page of the Renewed Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Remove	Insert
4	4

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Remove	Insert
3/4 3-24a	3/4 3-24a

(1) Technical Specifications

The Technical Specifications contained in Appendix A, revised through Amendment No. 272 and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto are hereby incorporated into the license. DENC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

(3) DENC shall not take any action that would cause Dominion Energy, Inc. or its parent companies to void, cancel, or diminish DENC's Commitment to have sufficient funds available to fund an extended plant shutdown as represented in the application for approval of the transfer of the licenses for MPS Unit No. 3.

(4) Immediately after the transfer of interests in MPS Unit No. 3 to DNC*, the amount in the decommissioning trust fund for MPS Unit No. 3 must, with respect to the interest in MPS Unit No. 3, that DNC* would then hold, be at a level no less than the formula amount under 10 CFR 50.75.

(5) The decommissioning trust agreement for MPS Unit No. 3 at the time the transfer of the unit to DNC* is effected and thereafter is subject to the following:

(a) The decommissioning trust agreement must be in a form acceptable to the NRC.

(b) With respect to the decommissioning trust fund, investments in the securities or other obligations of Dominion Energy, Inc. or its affiliates or subsidiaries, successors, or assigns are prohibited. Except for investments tied to market indexes or other non-nuclear-sector mutual funds, investments in any entity owning one or more nuclear power plants are prohibited.

(c) The decommissioning trust agreement for MPS Unit No. 3 must provide that no disbursements or payments from the trust, other than for ordinary administrative expenses, shall be made by the trustee until the trustee has first given the Director of the Office of Nuclear Reactor Regulation 30 days prior written notice of payment. The decommissioning trust agreement shall further contain a provision that no disbursements or payments from the trust shall be made if the trustee receives prior written notice of objection from the NRC.

(d) The decommissioning trust agreement must provide that the agreement cannot be amended in any material respect without 30 days prior written notification to the Director of the Office of Nuclear Reactor Regulation.

* On May 12, 2017, the name "Dominion Nuclear Connecticut, Inc." changed to "Dominion Energy Nuclear Connecticut, Inc."

TABLE 3.3-3 (Continued)

ACTION STATEMENTS

ACTION 18 - a. With one Control Building Inlet Ventilation Radiation Monitor channel inoperable, either restore the inoperable channel to OPERABLE status within 7 days or place the associated train of Control Room Emergency Ventilation System in the emergency mode of operation.[+] Otherwise, immediately suspend movement of recently irradiated fuel assemblies, if applicable, and be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With two Control Building Inlet Ventilation Radiation Monitor channels inoperable, immediately place one train of Control Room Emergency Ventilation System in the emergency mode of operation, declare one Control Room Emergency Ventilation System train inoperable, and comply with the ACTION requirements of Technical Specification 3.7.7. Otherwise, immediately suspend movement of recently irradiated fuel assemblies, if applicable, and be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

[+]Operation of the non-affected Control Room Emergency Ventilation System train, instead of the affected Control Room Emergency Ventilation System train, is permitted to perform required Technical Specifications 3.3.2 and 3.7.7 surveillance testing.

ACTION 19 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 272

TO RENEWED FACILITY OPERATING LICENSE NO. NPF-49

DOMINION ENERGY NUCLEAR CONNECTICUT, INC.

MILLSTONE POWER STATION, UNIT NO. 3

DOCKET NO. 50-423

1.0 INTRODUCTION

By letter dated April 4, 2018, as supplemented by letter dated October 22, 2018 (Agencywide Documents Access and Management System Accession Nos. ML18100A055 and ML18302A120, respectively), Dominion Energy Nuclear Connecticut, Inc. (the licensee) submitted a license amendment request to modify the technical specifications (TSs) related to control building ventilation for Millstone Power Station, Unit No. 3 (Millstone 3). Specifically, the licensee proposed to revise ACTION 18 in TS Table 3.3-3, Functional Unit 7.e, "Control Building Inlet Ventilation Radiation," to allow continued fuel handling and reactor operation with inoperable inlet radiation monitoring instrumentation, provided that one train of the control room emergency ventilation system (CREVS) is operating in the emergency mode. The proposed TS change specifies that one train of the CREVS be placed in the emergency mode of operation within 7 days if one radiation monitor channel is inoperable, or immediately, if both radiation monitor channels are inoperable.

The supplement dated October 22, 2018, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on July 17, 2018 (83 FR 33266).

2.0 REGULATORY EVALUATION

2.1 Description of the Control Room Emergency Ventilation System

Section 9.4.2, "Control Building Ventilation System," of the Millstone 3 Updated Final Safety Analysis Report (UFSAR) contains a description of the CREVS. The CREVS consists of an emergency air filtration subsystem and a control room air conditioning subsystem. The emergency air filtration subsystem contains redundant full capacity emergency air filtration units arranged in two parallel trains. The control room air conditioning subsystem contains redundant full capacity air conditioning units arranged in two parallel trains. The two subsystems work

together to provide a protected control room environment for operator control of the unit using common ductwork, valves, dampers, instrumentation, and other structures that form the low-leakage control room envelope.

The common Millstone 3 control building air intake contains redundant safety-related radiation monitors configured in two independent instrument channels. Both radiation monitor instrument channels are required to be OPERABLE in operating Modes 1, 2, 3, and 4, and during movement of recently irradiated fuel assemblies.

During normal operation, one train of the control room air conditioning subsystem is in operation, and the other train is in standby to maintain control room temperature within design limits and at a positive pressure relative to outside the control room envelope. The emergency air filtration subsystem is not in service under normal operating conditions.

The CREVS starts in the emergency mode of operation, which automatically pressurizes the control room envelope area with filtered air, using the emergency air filtration subsystem on receipt of a control building isolation signal. A control building isolation signal is initiated by any of the following conditions:

- high radiation at the common air-intake
- high containment pressure
- manual initiation from the main control board
- manual initiation from the ventilation control panel
- manual safety injection signal

The CREVS is train-dependent for automatic control building isolation actuation on either high radiation or high containment pressure, and train-independent for all manual actuations. For example, during automatic control building isolation actuation, when the Train 'A' control building inlet ventilation radiation monitor (i.e., 3HVC*RE16A) senses a high radiation condition, Train 'A' of the emergency air filtration subsystem will start. Similarly, if the Train 'B' radiation monitor (i.e., 3HVC*RE16B) senses a high radiation condition, Train 'B' of the emergency air filtration subsystem will start. However, when a manual control building isolation actuation signal is received, both trains receive a start signal. Train 'A' of the emergency air filtration subsystem (the preferred train) will start first. After a 60-second delay, Train 'B' of the emergency air filtration subsystem will start on low system flow if Train 'A' of the emergency air filtration subsystem fails to start or otherwise fails to establish flow.

2.2. Licensee's Proposed Changes

Functional Unit 7.e, "Control Building Inlet Ventilation Radiation," of Millstone 3 TS Table 3.3-3, "Engineered Safety Features Actuation System Instrumentation," specifies the total number of channels, the channels necessary to trip, the minimum number of OPERABLE channels, the applicable operational conditions, and the required action when the minimum number of OPERABLE channels is not satisfied under the specified operating conditions. Millstone 3 TS Table 3.3-3, ACTION 18 specifies the required actions when the required number of operable channels specified for Functional Unit 7.e is not met. The licensee summarized the proposed modifications to ACTION 18 in Millstone 3 TS Table 3.3-3, as follows:

- Existing ACTION 18 will be divided into two parts. ACTION 18.a will specify the action requirements when one control building inlet ventilation radiation monitor channel is

inoperable. ACTION 18.b will specify the action requirements when two (or both) control building inlet ventilation radiation monitor channels are inoperable.

- With one control building inlet ventilation radiation monitor channel inoperable, ACTION 18.a will specify that control room operators may place the associated train of the CREVS in the emergency mode of operation within 7 days as an alternative to requiring the initiation of a plant shutdown, which is the only permitted action specified by existing ACTION 18. The action specifies manually placing the "associated train" of CREVS (instead of either train) in the emergency mode because the inoperable radiation monitor channel would only prevent the automatic start of that train's emergency air filtration units in the emergency radiation protection mode, which is necessary to prevent a loss of safety function due to the Millstone 3 train-specific design of the actuation instrumentation.

- A note will be added to ACTION 18.a to permit operation of the non-affected or non-associated CREVS train instead of the associated train when in the action statement to allow completion of required surveillance testing of the non-associated train.

- With two control building inlet ventilation radiation monitor channels inoperable, ACTION 18.b will specify that control room operators are required to immediately place one train of the CREVS in the emergency mode of operation, declare one train of CREVS inoperable, and comply with the ACTION requirements of Millstone 3 TS 3.7.7, "Control Room Emergency Ventilation System." ACTION 18.b will allow 7 days to restore one channel of control building inlet ventilation radiation monitoring to operable status instead of requiring an immediate plant shutdown, as is currently required by ACTION 18.

Specifically, proposed ACTION 18 would state the following:

a. With one Control Building Inlet Ventilation Radiation Monitor channel inoperable, either restore the inoperable channel to operable status within 7 days or place the associated train of Control Room Emergency Ventilation System in the emergency mode of operation.+ Otherwise, immediately suspend movement of recently irradiated fuel assemblies, if applicable, and be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b. With two Control Building Inlet Ventilation Radiation Monitor channels inoperable, immediately place one train of Control Room Emergency Ventilation System in the emergency mode of operation, declare one Control Room Emergency Ventilation System train inoperable, and comply with the ACTION requirements of Technical Specification 3.7.7. Otherwise, immediately suspend movement of recently irradiated fuel assemblies, if applicable, and be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

+ Operation of the non-affected Control Room Emergency Ventilation System train, instead of the affected Control Room Emergency Ventilation System train, is permitted to perform required Technical Specifications 3.3.2 and 3.7.7 surveillance testing.

2.3 Regulatory Review

The proposed license amendment involves a change to the content of the TSs. The NRC staff reviews the proposed TS changes for compliance with applicable regulations and conformance with associated regulatory guidance.

As stated in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.34(a)(3)(i), the General Design Criteria (GDC) of Appendix A to 10 CFR Part 50 establish minimum requirements for the principal design criteria for water-cooled nuclear power plants similar in design to plants for which construction permits have previously been issued by the Commission. Under 10 CFR 50.34(b), the final safety analysis report includes a description of the facility; presents the design bases and the limits on its operation; and presents a safety analysis of the structures, systems, and components and of the facility.

Section CFR 50.36 of 10 CFR provides the regulatory requirements for TSs. Specifically, 10 CFR 50.36(b) states, in part: "The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34."

Finally, 10 CFR 50.36(c)(2)(i) states, in part:

> Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

Section 3.1, "Conformance with NRC General Design Criteria," of the Millstone 3 UFSAR states that the design bases of Millstone 3 are measured against and comply with the GDC in Appendix A to 10 CFR Part 50, as amended through October, 27, 1978, with certain exceptions.

Section 3.1.2.19, "Control Room," of the Millstone 3 UFSAR addresses conformance with General Design Criteria 19, "Control Room," which specifies, in part:

> Adequate radiation protection shall be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident.

Section 3.1.2.19 further describes the design conformance with Criterion 19 and states that the ventilation system design, as described in Section 9.4.1 of the UFSAR, permits continuous occupancy of the control room during design-basis accidents without the dose to personnel exceeding 5 Roentgen equivalent man (rem) (a unit to measure effective dose) total effective dose equivalent.

Guidance for NRC staff review of TSs is contained in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition," Revision 3, Section 16.0, "Technical Specifications." The NRC staff has prepared Standard Technical Specifications (STS) for each of the light-water reactor nuclear steam supply systems and associated balance-of-plant equipment systems. The guidance specifies that the staff review whether content and format of the proposed TSs are consistent with the

applicable STS. Where TS provisions depart from the referenced TSs, the staff determines whether proposed differences are justified by uniqueness in plant design or other considerations to ensure that the requirements of 10 CFR 50.36 continue to be met. The applicable STS for Millstone 3 are contained in NUREG-1431, Revision 4.0, Volume 1, "Standard Technical Specifications – Westinghouse Plants: Specifications."

3.0 TECHNICAL EVALUATION

The model STS 3.3.7A, "Control Room Emergency Filtration System (CREFS) Actuation Instrumentation," in NUREG-1431, Revision 4, specifies the required actions when the required number of instrumentation channels for the control room air intake radiation monitoring function are not OPERABLE. For one inoperable control room air intake radiation monitoring channel (Condition A of STS 3.3.7A), the required action is to place one CREFS train in the emergency radiation protection mode with a completion time of 7 days. For two inoperable control room air intake radiation monitoring channels (Condition B of STS 3.3.7A), the required actions are to immediately place one CREFS train in the emergency radiation protection mode and to either immediately enter applicable conditions and required actions for one CREFS train made inoperable by inoperable CREFS actuation instrumentation or immediately place both CREFS trains in the emergency radiation protection mode.

If the required actions and associated completion times of either Condition A or Condition B of STS 3.3.7A are not met when in Mode 1, 2, 3, or 4 (Condition C of STS 3.3.7A), the required actions are to place the plant in Mode 3 (Hot Standby) within 6 hours and in Mode 5 (Cold Shutdown) within 36 hours. If the required actions and associated completion times of either Condition A or Condition B of STS 3.3.7A are not met during movement of recently irradiated fuel (Condition D of STS 3.3.7A), the required action is to immediately suspend movement of recently irradiated fuel assemblies.

The conditions and required actions for one CREFS train made inoperable by inoperable CREFS actuation instrumentation (Condition A of STS 3.7.10, "Control Room Emergency Filtration System (CREFS)") are to restore one CREFS train to OPERABLE status within 7 days.

The NRC staff compared the above STS specified actions with the proposed ACTION 18.a, which provides the required actions when the minimum number of OPERABLE channels specified is not met for Functional Unit 7.e, "Control Building Inlet Ventilation Radiation," of Millstone 3 TS Table 3.3-3 because one Control Building Inlet Ventilation Radiation Monitor channel is inoperable. The staff found that proposed ACTION 18.a specifies equivalent actions to those specified for Conditions A, C, and D of STS 3.3.7A. ACTION 18.a contains actions equivalent to those for Condition A of STS 3.3.7 because both allow a period of 7 days to restore the inoperable channel to operable status before requiring one train of the CREVS be placed in its emergency mode of operation. If the inoperable channel is restored to operable status within 7 days, the instrument would perform its intended function of starting the associated CREVS train in the emergency mode of operation upon detection of high radiation at the common air inlet. Similarly, if the CREVS is placed in the emergency mode of operation, the function of the instrument channel would be completed because the operating train would filter air supplied to the control room. Otherwise, both Action 18.a and the actions associated with Conditions C and D of STS 3.3.7 require the establishment of conditions where the limiting condition for operation (LCO) no longer applies by placing the plant in cold shutdown and suspending movement of recently irradiated fuel. Thus, the specified actions result in identical end states at similar times, with the completion times for proposed ACTION 18.a being the

shorter and more conservative times. However, ACTION 18.a includes the following two differences to address specific design considerations for Millstone 3: (1) the CREVS train associated with the inoperable instrument channel must be the train placed in service, and (2) a note permits temporary operation of the non-affected train instead of the affected train of CREVS for surveillance testing of either the instrumentation or ventilation system. These specifications are necessary because each control room air intake radiation monitoring instrument channel initiates a control building isolation signal for a single train, and the CREVS is designed for operation of only one CREVS filtration train at a time. Therefore, proposed ACTION 18.a is consistent with the applicable STS, and the minor differences in required actions are justified by specific design features. Thus, proposed ACTION 18.a is acceptable.

Similarly, the staff compared the conditions and required actions described in proposed ACTION 18.b to those specified for Conditions B, C, and D of STS 3.3.7A. The staff found proposed ACTION 18.b specifies equivalent actions, with the exception that proposed ACTION 18.b does not include the alternative action of Condition B of STS 3.3.7A to place both CREVS trains in the emergency radiation protection mode. Instead, proposed ACTION 18.b specifies to immediately place one train of CREVS in the emergency radiation protection mode, declare one CREVS train inoperable, and comply with the action requirements of Millstone 3 TS 3.7.7.

Millstone 3 TS 3.7.7 states that, when one CREVS train is inoperable in Modes 1, 2, 3, or 4, ACTION a. applies and requires:

> With one Control Room Emergency Air Filtration System inoperable, except as specified in ACTION c. [inoperable control room envelope], restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Additionally, Millstone 3 TS 3.7.7 states that, during movement of recently irradiated fuel assemblies with one CREVS train inoperable, ACTION d. applies and requires:

> With one Control Room Emergency Air Filtration System inoperable, restore the inoperable system to OPERABLE status within 7 days. After 7 days, either initiate and maintain operation of the remaining OPERABLE Control Room Emergency Air Filtration System in the emergency mode of operation, or immediately suspend the movement of recently irradiated fuel assemblies.

The NRC staff evaluated the specified actions of Millstone 3 TS 3.7.7 against the specified actions from STS 3.7.10, which is the STS corresponding to Millstone 3 TS 3.7.7. The specified actions result in identical end states at similar times. Thus, the required actions for one inoperable CREVS train specified in Millstone 3 TS 3.7.7 are equivalent to required actions for Condition A of STS 3.7.10. However, under the proposed actions for two inoperable radiation monitor channels, the staff concluded that the proposed actions would permit Millstone 3 operators to maintain operation of one control room emergency air filtration system in the emergency mode of operation without suspending movement of irradiated fuel assemblies because the "otherwise" condition of proposed ACTION 18.b would not be satisfied. The staff found this outcome in conflict with the licensee's description of the actions for two inoperable radiation monitor channels provided in Attachment 1 to the license amendment request, which states, in part:

> If one channel of radiation monitoring is not restored within 7 days, movement of recently irradiated fuel will be immediately suspended, if applicable, and the unit would be placed in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. This proposed change is consistent with the requirements of the standard TSs (i.e., TS 3.3.7.A REQUIRED ACTION B.1.1 and B.1.2) for Westinghouse plants (NUREG-1431) since it provides the actuation instrumentation function to place the unit in a conservative mode of operation and limits the time in this configuration.

The NRC staff requested additional information to clarify the intended actions when two radiation monitor channels are inoperable and neither is returned to operable status within 7 days while movement of recently irradiated fuel is underway. By letter dated October 22, 2018, the licensee provided a revision to the above statement indicating that movement of recently irradiated fuel can continue, provided that one train of CREVS is operating in the emergency mode, consistent with proposed ACTION 18.b and the required actions of Millstone 3 TS 3.7.7 for one inoperable CREVS train. The description of the actions for two inoperable radiation monitor channels was modified by the licensee in the October 22, 2018, letter, as follows (deleted text is struck through and added text is bolded):

> If one channel of radiation monitoring is not restored within 7 days, ~~movement of recently irradiated fuel will be immediately suspended, if applicable, and~~ the unit would be placed in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. **The movement of recently irradiated fuel can continue provided one train of CREVS is operating in the emergency mode consistent with the requirement of MPS3 TS 3.7.7.** This proposed change is consistent with the requirements of the standard TSs (i.e., TS 3.3.7.A REQUIRED ACTION B.1.1 and B.1.2) for Westinghouse plants (NUREG-1431) since it provides the actuation instrumentation function to place the unit in a conservative mode of operation and limits the time in this configuration.

The licensee justified continued movement of recently irradiated fuel because operation of one CREVS train in the emergency mode is consistent with the current radiological analysis of record for the design-basis fuel handling accident, which demonstrates dose consequences to the control room operators would be within acceptable limits.

The staff determined that proposed ACTION 18.b is consistent with the corresponding STS actions and provides for reasonable assurance of safe operations. With two radiation monitoring channels inoperable, proposed ACTION 18.b requires immediate placement of one CREVS train in the emergency mode of operation, which completes the safety function of the radiation monitor by ensuring a supply of filtered air to the control room. If the plant is operating in Modes 1, 2, 3, or 4, and the licensee fails to either immediately place one CREVS train in the emergency mode of operation or restore the inoperable CREVS train to operable status within 7 days by restoring one radiation monitoring channel, the plant must be placed in a mode where the LCO no longer applies. These actions provide reasonable assurance that one train of CREVS would reliably be operating in the emergency mode of operation to protect control room operators from a potential release of radioactive material or that the plant would be promptly placed in an operating mode where an energetic release of radioactive material would not be credible (COLD SHUTDOWN). Similarly, if recently irradiated fuel is being handled and the licensee fails to place and maintain one CREVS train in the emergency mode of operation, the plant must be placed in a condition where the LCO no longer applies by immediately

suspending movement of recently irradiated fuel. The operation of one CREVS train in the emergency mode of operation provides protection consistent with that found to be acceptable in the fuel handling accident analysis, and the suspension of movement of recently irradiated fuel places the plant in a condition where the release of radioactive material through a fuel handling accident would not be credible. Therefore, proposed ACTION 18.b is acceptable.

The staff finds that the proposed TS changes are consistent with NRC regulations and policies. The NRC staff concludes that the requirements of 10 CFR 50.36(c)(2)(i) continue to be met because the minimum performance level of equipment needed for safe operation of the facility as specified in Millstone 3 TS Functional Unit 7.e, "Control Building Inlet Ventilation Radiation," of Millstone 3 TS Table 3.3-3 remains unchanged, and appropriate remedial measures are specified if the LCO is not met in the proposed revised ACTION 18. The proposed revisions to ACTION 18 are consistent with the guidance of Section 16.0 of NUREG-0800 and applicable portions of the STS incorporated in NUREG-1431. Therefore, the NRC staff has determined that there is reasonable assurance that the licensee will continue to comply with NRC regulations and that the health and safety of the public will not be endangered. As such, the proposed changes to Millstone 3 TSs are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut State official was notified of the proposed issuance of the amendment on February 22, 2019. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on this finding (July 17, 2018; 83 FR 33266). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Steve Jones

Date: March 21, 2019

D. Stoddard

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 3 – ISSUANCE OF AMENDMENT NO. 272 REGARDING REVISIONS TO TECHNICAL SPECIFICATIONS ACTION STATEMENT FOR LOSS OF CONTROL BUILDING INLET VENTILATION RADIATION MONITOR INSTRUMENTATION CHANNELS (EPID L-2018-LLA-0099) DATED MARCH 21, 2019

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