From:	Semancik, Jeffrey
To:	Guzman, Richard
Subject:	[External_Sender] RE: Planned Issuance of Millstone Unit 2 Proposed License Amendment - Revision to TS Table 3.3-11, Accident Monitoring Instrumentation (EPID L-2020-LLA-0039)
Date:	Monday, February 01, 2021 10:10:10 AM
Attachments:	image001.png image003.png

Richard,

Thank you for the response. I have not other questions or commetns wit the proposed LA.

Jeff

Jeffrey Semancik
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From: Guzman, Richard <Richard.Guzman@nrc.gov>
Sent: Monday, February 1, 2021 9:52 AM
To: Semancik, Jeffrey <Jeffrey.Semancik@ct.gov>
Cc: Tifft, Doug <Doug.Tifft@nrc.gov>
Subject: RE: Planned Issuance of Millstone Unit 2 Proposed License Amendment - Revision to TS Table 3.3-11, Accident Monitoring Instrumentation (EPID L-2020-LLA-0039)

Jeff,

The NRC staff's response to your comment/questions are provided below. My current projection for issuance of the amendment is by the end of the month (February 2021). A

copy of this e-mail will be referenced in the staff's safety evaluation by ADAMS accession number. Thanks again for your attention on the subject proposed licensing action. Please contact me if you have any further questions.

***Question 1** – Neither the proposed action statement nor the associated bases indicate that the "alternate method" be available from the control room or have a human factors review. These were requirements for implementation of NUREG-0737 II.D.3. Does this mean the licensee can implement alternate methods outside the control room? Do these methods require review per 50.59?*

It is the NRC staff's understanding that the term "alternative method" as used in the proposed Action 3 INSERT, refers directly to the remaining "above mentioned tank parameters or discharge pipe temperatures" (also from the proposed INSERT). Additionally, the proposed INSERT to Action 3 immediately follows the direction to "obtain quench tank temperature, level and pressure information, and monitor discharge pipe temperature one per shift to determine valve position." Technical Specifications are not intended to be completely prescriptive and does allow for some operational flexibility. For these reasons, the staff has reasonable assurance that the operators will utilize the remaining operable direct parameters, in conjunction with indirect parameters, which is described in the LAR and is in part of the existing Initial License Training (ILT) and Licensed Operator Requalification (LOR).

Regarding 10 CFR 50.59, as you may be aware, the intent of the 50.59 process is to permit licensees to make changes to the facility without NRC approval through a license amendment, provided the changes maintain acceptable levels of safety as described in the applicable final safety analysis report (as updated). The licensee is responsible for operating the plant safely in accordance with NRC regulations irrespective of whether NRC approval of a change test or experiment is required. The licensee determines whether a change meets the criteria of 10 CFR 50.59 and may be made without prior NRC approval. Thus, if a licensee proposes to change or apply a different "alternative method", they would be expected to determine whether the proposed change meets the criteria of 10 CFR 50.59 and whether it may be made without prior NRC approval.

***Question 2** – The technical basis discussed by the licensee focuses on detecting an inadvertent lift of a PORV. However, the basis for this parameter as explained in NUREG-0578 was detect that an open PORV gets properly closed. For example, DENC identifies several alarms that would occur following inadvertent lifting of a PORV in their response to RAI1. However, all of these alarms would likely remain following closure of an open PORV until temperature and quench tank parameters reduced below setpoints. Without analog indication of the trend in these parameters, they do not provide reliable indication that operators have successfully closed a PORV after being open. I believe that primary system parameters coupled with successive isolation of PORV block valve would be the way to diagnose this and T/S 3.4.3 ensures block valves are operable. Are you comfortable that the licensee's submittal adequately describes emergency procedures and operator training sufficient to ensure they can detect that a previously open PORV is closed?*

The NRC staff recognizes the challenges and reliance on operator training to diagnose valve position when primary valve position is not available. The availability of multiple independent instruments, or direct parameters (PORV and PSV discharge pipe temperature and various Quench Tank Parameters), in combination with already monitored RCS parameters, or indirect parameters, allow operators to determine valve position. The existing operator training and monitoring strategies use both direct and indirect parameters are part of the Initial License Training (ILT) and Licensed Operator Requalification (LOR). Historical trending data of the direct parameters indicates a high degree of reliability. In response to the RAI-2, the normal and abnormal discharge pipe temperatures alone can provide sufficient and differentiated values to provide indication of valve position. Additionally, the staff notes there are continuous multi-variable recorders for the discharge pipe temperatures that can aid operators in developing trend information (Drawing 25203-26014 Rev 46, Sheet 2). For these reasons, the staff has reasonable assurance that the operators can determine valve position, including detecting proper closure after an opening, with the combination of available direct and indirect parameters, which is already part of strategies within the existing ILT and LOR.

Thanks,
Rich Guzman
Sr. PM, Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
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Richard.Guzman@nrc.gov

From: Semancik, Jeffrey <Jeffrey.Semancik@ct.gov>
Sent: Thursday, January 21, 2021 4:48 PM
To: Guzman, Richard <Richard.Guzman@nrc.gov>
Cc: Tifft, Doug <Doug.Tifft@nrc.gov>
Subject: [External_Sender] RE: Planned Issuance of Millstone Unit 2 Proposed License Amendment - Revision to TS Table 3.3-11, Accident Monitoring Instrumentation (EPID L-2020-LLA-0039)

Richard,

First, I want to acknowledge the quality of the NRC staff review of this amendment. The RAIs ensured that ambiguity was removed from the initially proposed action statement and demonstrated a good technical questioning attitude by your staff.

I do have a few comment/questions related to the proposed LA:

- Neither the proposed action statement nor the associated bases indicate that the "alternate method" be available from the control room or have a human factors review. These were requirements for implementation of NUREG-0737 II.D.3. Does this mean the licensee can implement alternate methods outside the control room? Do these methods require review

per 50.59?

- The technical basis discussed by the licensee focuses on detecting an inadvertent lift of a PORV. However, the basis for this parameter as explained in NUREG-0578 was detect that an open PORV gets properly closed. For example, DENC identifies several alarms that would occur following inadvertent lifting of a PORV in their response to RAI1. However, all of these alarms would likely remain following closure of an open PORV until temperature and quench tank parameters reduced below setpoints. Without analog indication of the trend in these parameters, they do not provide reliable indication that operators have successfully closed a PORV after being open. I believe that primary system parameters coupled with successive isolation of PORV block valve would be the way to diagnose this and T/S 3.4.3 ensures block valves are operable. Are you comfortable that the licensee's submittal adequately describes emergency procedures and operator training sufficient to ensure they can detect that a previously open PORV is closed?

V/R,
Jeff

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From: Guzman, Richard <Richard.Guzman@nrc.gov>
Sent: Thursday, January 21, 2021 2:28 PM
To: Semancik, Jeffrey <Jeffrey.Semancik@ct.gov>
Cc: Tifft, Doug <Doug.Tifft@nrc.gov>
Subject: Planned Issuance of Millstone Unit 2 Proposed License Amendment - Revision to TS Table 3.3-11, Accident Monitoring Instrumentation (EPID L-2020-LLA-0039)

Jeff,

The NRC staff is preparing the subject license amendment regarding Millstone Power Station, Unit No 2 for issuance. 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 February 4th if possible. My current projection for issuance of the amendment is by February 26, 2021.

Millstone Power Station, Unit No. 2 (MPS2) – License Amendment to Revise TS Table 3.3-11, Accident Monitoring Instrumentation (EPID L-2020-LLA-0039)

Application date:
March 3, 2020, as supplemented by letter dated September 17, 2020 (ADAMS Accession Nos ML20065K976 and ML20261H598, respectively)

Brief Description of LAR:
The license amendment would revise MPS2 Technical Specification (TS) Table 3.3-11, "Accident Monitoring Instrumentation," Action 3, to address unnecessary restrictions for monitoring valve position when any of the three valve position monitoring indications (i.e., Instruments 4, 5, and 6) become inoperable. Specifically, the revision to Action 3 of TS Table 3.3-11, would add an alternate method for determining if there is loss of coolant through a power-operated relief valve (PORV) or pressurizer safety valve (PSV) flow path, in the event that any of the instruments identified in the current action statement are not available.

FR Publish Date:
The LAR was published in the Federal Register (FR) on April 21, 2020 (85 FR 22185)
https://www.govinfo.gov/content/pkg/FR-2020-04-21/pdf/2020-07978.pdf

Thank you,
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