



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

October 31, 2023

Eric S. Carr
President – Nuclear Operations
and Chief Nuclear Officer
Dominion Energy, Inc.
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNITS 2 AND 3 – INFORMATION REQUEST FOR QUADRENNIAL BASELINE COMPREHENSIVE ENGINEERING TEAM INSPECTION; NOTIFICATION TO PERFORM INSPECTION 05000336/2024011 AND 05000423/2024011

Dear Eric Carr:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region I staff will conduct a Comprehensive Engineering Team Inspection (CETI) at Millstone Power Station, Units 2 and 3. Jeff Kulp, a Senior Reactor Inspector from the NRC's Region I office, will lead the inspection team. The inspection will be conducted in accordance with Inspection Procedure 71111.21M, "Comprehensive Engineering Team Inspection (CETI)," dated January 1, 2023 (ADAMS Accession No. ML19084A030). This inspection combines elements of the Design Basis Assurance Inspection (Teams), the Heat Exchanger/Sink Performance inspection (71111.07T), and the Evaluations of Changes, Tests and Experiments inspection (71111.17).

The inspection will evaluate the capability of risk-significant/low-margin components to function as designed to support proper system operation. The inspection will also include a review of selected modifications, operating experience, and as applicable, operator actions.

In an exchange of emails between Jeff Kulp and Dan Beachy, Millstone Regulatory Assurance, on October 11, 2023, we confirmed arrangements for an information-gathering site visit and the two-week onsite inspection. The schedule is as follows:

- Information-gathering visit: Week of January 8, 2024
- Onsite weeks: Weeks of February 26, 2024 and March 11, 2024

The purpose of the information-gathering visit is to meet with members of your staff to identify risk-significant components, modifications, operator actions, and operating experience items. Information and documentation needed to support the inspection will also be identified. David Werkheiser, a Region I Senior Risk Analyst, will support Jeff during the information-gathering visit to review probabilistic risk assessment data and identify components to be examined during the inspection.

Experience with previous baseline design/modification inspections of similar depth and length has shown this type of inspection is resource intensive, both for the NRC inspectors and the licensee staff. In order to minimize the inspection impact on the site and to ensure a productive inspection for both parties, we have enclosed a request for information needed for the inspection.

It is important that all of these documents are up-to-date and complete in order to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. Insofar as possible, this information should be provided electronically to the lead inspector. The information request has been divided into two groups:

- The first group lists information necessary for our initial inspection scoping activities. This information should be provided to the lead inspector by January 5, 2024. By January 19th, the lead inspector will communicate the initial selected set of components, modifications, 50.59 screenings, and operating experience samples.
- The second group of documents requested is those items needed to support our in-office preparation activities. This set of documents, specific to the selected components and modifications, should be provided to the lead inspector at the Regional Office no later than February 16th, 2024. During the in-office preparation activities, the team may identify additional information needed to support the inspection, and those items will be communicated directly to Dan Beachy.

If there are any questions about the inspection or the material requested in the enclosure, please contact the lead inspector at (610) 547-2603 or via email at jak2@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the *Paperwork Reduction Act of 1995* (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations*, Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Mel Gray, Chief
Engineering Branch 1
Division of Operating Reactor Safety

Docket Nos. 05000336 and 05000423
License Nos. DPR-65 and NPF-49

Enclosure:
Document Request for Comprehensive
Engineering Team Inspection

cc w/encl: Distribution via ListServ

SUBJECT: MILLSTONE POWER STATION, UNITS 1 AND 2 – INFORMATION REQUEST FOR QUADRENNIAL BASELINE COMPREHENSIVE ENGINEERING TEAM INSPECTION; NOTIFICATION TO PERFORM INSPECTION 05000220336/2024011 AND 05000423/2024011 DATED OCTOBER 31, 2023

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DOCUMENT REQUEST FOR COMPREHENSIVE ENGINEERING TEAM INSPECTION

- Onsite Inspection Dates:** February 26, 2024 through March 1, 2024; and
March 11, 2024 through March 15, 2024
- Inspection Procedure:** Inspection Procedure 71111.21M, Comprehensive Engineering
Team Inspection (CETI)
- Lead Inspector:** Jeff Kulp, Senior Reactor Inspector
(610) 547-2603
JAK2@nrc.gov
- Inspection Report:** 05000336/2024011 and 05000423/2024011

I. Information Requested for Sample Selection Process

The following information is requested by January 5, 2024 to facilitate inspection preparation. Feel free to contact the lead inspector as soon as possible if you have any questions regarding this information request. Please provide the information electronically in "pdf" files, Word, Excel, or other searchable format. The files should contain descriptive names and be indexed and hyperlinked to facilitate ease of use. Information in "lists" should contain enough information to be easily understood by someone who has knowledge of light water reactor technology.

1. The site probabilistic risk analysis (PRA) "System Notebook" and latest PRA Summary Document for both units.
2. Risk ranking of top 250 basic events sorted by Risk Achievement Worth (≥ 1.3) for both units. Include values for Risk Reduction Worth, Birnbaum Importance, and Fussell-Vesely (as applicable). Please provide in an Excel spreadsheet or other sortable format and include an understandable definition of the coded basic events.
3. Risk ranking of top 100 components from site specific PRA sorted by Large Early Release Frequency for both units.
4. If you have an External Events PRA Model, provide the information requested in Item 2 for external events for both units. Provide narrative description of each coded event, including flood zone description.
5. List of time-critical and/or risk-significant operator actions for both units.
6. List of emergency and abnormal operating procedures for both units.
7. If available, any pre-existing evaluation or list of components and associated calculations with low design margins (e.g., pumps closest to the design limit for flow or pressure, diesel generator close to design required output, heat exchangers close to rated design heat removal) for both units.
8. If applicable, copy of any self-assessments and/or Quality Assurance assessments of low-margin structures, systems, and components (SSCs), completed in the last 3 years.

Enclosure

9. List of available design margins in both the open and closed direction for valves in the motor-operated valve and air-operated valve programs (related to GL 96-05, looking for resultant output – matrix of risk vs margin for motor and air operated valves , as applicable) for both units.
10. The age and capacity of the safety-related DC batteries for both units.
11. The In-Service Testing Program (IST) Basis document identifying the in-scope valves and pumps, and the associated IST Program requirements for each component (e.g., IST valve table identifying category, active/passive function) for both units.
12. Listing of MR (a)(1) systems, date entered into (a)(1) status, and brief description of why (a)(1).
13. List of maintenance rule functional failure (MRFF) evaluations completed since January 1, 2021 (include those determined not to be a MRFF).
14. A copy of the most recent System Health and/or trending reports for the following systems (as applicable):
 - Unit 2
 - Class 1E 4KV distribution, Safety-Related 480VAC, Service Water, Class 13 125 VDC System, Auxiliary Feedwater system, Safety Injection (High and Low Pressure) system, Chemical and Volume Control System, Containment Spray, Reactor Building Closed Cooling Water System, and Emergency Diesel Generators.
 - Unit 3
 - Class 1E 4.16KV distribution, Class 1E 480/120 VAC distribution, Service Water, Class 1E 125 VDC, Auxiliary Feedwater, Safety Injection (High and Low Pressure), Chemical and Volume Control System, Recirculation Spray and Quench Spray Systems, Residual Heat Removal System, Alternate AC Source, Reactor Plant Component Cooling System, and Emergency Generators
15. A copy of the most recent Program Health and/or trending reports for the following programs, as applicable: GL 89-10 (MOVs), GL 89-13, IST, AOVs, breakers, relays.
16. List of open operability evaluations for both units.
17. List of Root Cause Evaluations associated with SSC failures or design issues initiated/ completed in the last three years.
18. List of “permanent plant modifications” to SSCs that are field work complete since November, 2020. For the purpose of this inspection, permanent plant modifications include permanent: plant changes, design changes, set point changes, equivalency evaluations, suitability analyses, and commercial grade dedications. The list should contain the number of each document, title (sufficient to understand the purpose of the modification), revision/date, and the affected system.

19. List of calculation changes (including new calculations) that have been issued for use since November 2020.
20. List of corrective action documents initiated since November 2020, that address permanent plant modifications issues, concerns, or processes.
21. A copy of any internal or external self-assessments performed in preparation for this inspection.
22. Technical Requirements Manual for both units.
23. Electrical simple one-line drawings for Unit 2 and Unit 3 – From offsite power to 600V/4KV, and 125 V DC
24. A list of NRC Part 21 Reports, determined to be applicable to Millstone, since September 1, 2020
25. List of all 50.59 applicability reviews, screenings, and evaluations completed since November 2021. [Note: if six or less 50.59 safety evaluations, please include electronic copy of all evaluations. The last SE reviewed was MS3-SE-2020-001 and MPS2-EVAL-2019-0004]
26. Copy of Millstones most recent Changes, Test and Experiments summary report [50.59(d)(2)] for both units

II. Information Requested to Be Available by February 16, 2024

This information should be separated for each selected component and modification, especially if provided electronically (e.g., a folder for each component and modification named after the component or modification that includes the information requested below). Items 1 through 11 are associated with the selected components and Item 12 is for the selected modifications.

1. List of corrective action documents associated with each selected component for the last three years.
2. Maintenance history (e.g., corrective, preventive, and elective) associated with each selected component for the last five years. Identify frequency of preventive maintenance activities.
3. Aging Management Program documents applicable to each selected component
4. List of calculations associated with each selected component, excluding data files. Pipe stress calculations are excluded from this request.
5. System Health Report (last completed) and Design Basis Document associated with each selected component.
6. Access to or copy of vendor manual(s) for each selected component.

7. List of open temporary modifications associated with each selected component, if applicable.
8. Trend data/graphs on the selected components' performance for the last three years (e.g., pump performance including IST, other vibration monitoring, oil sample results).
9. List of normal operating and alarm response procedures associated with each selected component.
10. Last completed tests and surveillances for each selected component performed during the last three years. For those tests and surveillances performed at a periodicity of greater than three years, provide the latest test performed.
11. Schedule of surveillance testing of selected components that occur during the onsite inspection weeks.
12. For each selected modification, copies of associated documents such as modification package, engineering changes, 50.59 screening or evaluation, relevant calculations, post-modification test packages, associated corrective action documents, design drawings, and new/revised preventive maintenance requirements.
13. A copy of the evaluation or screening document for each of the selected 50.59 evaluation/screens. A copy of the modification package if the evaluation/screen pertains to a modification.