

April 15, 2003

MEMORANDUM TO: James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager, Section 2 /RA/  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2,  
FACSIMILE TRANSMISSION, ISSUES TO BE DISCUSSED IN AN  
UPCOMING CONFERENCE CALL (TAC NO. MB6108)

The attached information was transmitted by facsimile on April 15, 2003, to Mr. Ravi Joshi of Dominion Nuclear Connecticut, Inc. (the licensee). This information was transmitted to facilitate a upcoming conference call in order to clarify the licensee's amendment request dated August 14, 2002, as supplemented on March 11, 2003. The proposed amendment would revise the Technical Specifications related to reactivity control systems, power distribution limits, and special test exceptions.

This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-336

Attachment: Issues for Discussion in Upcoming Telephone Conference

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ISSUES FOR DISCUSSION IN UPCOMING TELEPHONE CONFERENCE  
REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS  
REACTIVITY CONTROL SYSTEMS, POWER DISTRIBUTION LIMITS, AND  
SPECIAL TEST EXCEPTIONS  
MILLSTONE POWER STATION, UNIT NO. 2  
DOCKET NO. 50-336

By letter dated August 14, 2002, as supplemented on March 11, 2003, Dominion Nuclear Connecticut, Inc. (DNC or the licensee), submitted a proposed amendment to the Technical Specifications (TSs) for Millstone Power Station, Unit No. 2 (MP2). The proposed amendment would revise the MP2 TSs related to reactivity control systems, power distribution limits, and special test exceptions.

By letter dated January 28, 2003, the Nuclear Regulatory Commission (NRC) staff provided a Request for Additional Information (RAI) to DNC with respect to the submittal dated August 14, 2002. The licensee provided a response to the RAI by letter dated March 11, 2003. The NRC staff has reviewed the information the licensee provided that supports the proposed TS changes and would like to discuss the following issues to clarify the submittals.

1. Your RAI response dated March 11, 2003, does not fully answer question 2. Specifically, your current TSs (CTS), Limiting Condition for Operation (LCO) 3.1.3.1 and Surveillance Requirement (SR) 4.1.1.1.1.a contain action statements for control element assemblies (CEAs) that are immovable but trippable. Your proposed LCO 3.1.3.1 states that all CEAs shall be OPERABLE. TS 1.6 indicates that the CEAs would be inoperable when they or any support system were incapable of performing their specified functions. In automatic control, a function of the CEAs would be to move in order to regulate core reactivity. An immovable CEA would, therefore, be considered inoperable. However, your proposed LCO 3.1.3.1 no longer contains action statements for rods that are immovable but trippable. Therefore, following your TS logic, an immovable but trippable CEA would require your plant to enter LCO 3.0.3 for shutdown. Your CTS, on the other hand, allow for operation of up to 7 days in this condition. Do you intend to force your plant into TS 3.0.3 for an immovable but trippable CEA? If not, provide a justification for removal of the operation limits for immovable but trippable CEAs.
2. Your RAI response dated March 11, 2003, does not fully answer question 3. Why is it necessary to increase your initial SR 4.1.1.1.2 requirement of 31 effective full power days (EFPDs) to 60 EFPDs? What is the safety significance of this change? Provide a safety justification.

ATTACHMENT

3. Your RAI response dated March 11, 2003, to question 4 indicates that the verification of shutdown margin (SDM) in SR 4.1.1.1.1.c is not necessary because the core reload design process calculates the SDM when the rods are at their insertion limits. By this logic, SR 4.1.1.1.1.c was never necessary in the life of the plant. If not, what is the purpose of SR 4.1.1.1.1.c? If you delete SR 4.1.1.1.c, how will this purpose be satisfied? What is the safety significance of the deletion?
4. Your RAI response dated March 11, 2003, to question 5 indicates that the wording difference between the proposed and current LCO 3.1.3.1 does not change its requirements. However, in the original LCO 3.1.3.1, the maximum separation of any CEA with respect to any other CEA would be 10 steps. In the proposed LCO, on the other hand, this difference could be up to 20 steps (i.e., one CEA 10 steps below group position and one CEA 10 steps above group position). With this condition, you would still be in compliance with the TS but would be less conservative. Provide a justification for this change.
5. Your RAI response dated March 11, 2003, to question 8 appears inaccurate in that you state the plant could operate for up to 6 hours at 100% power with  $F_r^T$  outside its limit when in LCO 3.2.4.b. However, LCO 3.2.4.b states that you can only operate for 2 hours with  $F_r^T$  inside its limit while  $T_q > 0.10$  (with  $F_r^T$  outside its limits, you would have to enter TS 3.0.3). After the 2 hour period, you must reduce power to less than or equal to 20% of maximum allowable thermal power. Clarify your safety justification given the above information and given that the Standard TSs only allow 1 hour to verify  $F_r^T$ . Furthermore, with  $T_q > 0.10$ , your current TS 3.2.4.b, only allows continuous operation at 20% power or below. However, your proposed TS 3.2.4.b.3 would allow continuous operation at 50% power or below with  $T_q > 0.10$ . Provide a safety justification for this change.