

July 25, 2003

Mr. David A. Christian
Sr. Vice President and Chief Nuclear Officer
Dominion Nuclear Connecticut, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2 - ISSUANCE OF AMENDMENT
RE: CONTAINMENT SYSTEMS (TAC NO. MB6109)

Dear Mr. Christian:

The Commission has issued the enclosed Amendment No. 278 to Facility Operating License No. DPR-65 for the Millstone Power Station, Unit No. 2, in response to your application dated August 14, 2002, as supplemented on April 7, 2003.

The amendment revises the Technical Specifications (TSs) related to Containment Systems. Specifically, the amendment: (1) adds a new requirement for a Containment Tendon Surveillance Program to TS Section 6.0, "Administrative Controls;" (2) deletes TS 3/4.6.1.6, "Containment Structural Integrity;" (3) revises TS 3/4.6.1.1, "Containment Integrity," to add a new surveillance requirement that requires that containment structural integrity be verified in accordance with the Containment Tendon Surveillance Program; (4) revises TS 3/4.6.3.1, "Containment Isolation Valves," to add a new action statement that increases the allowed outage time from 4 hours to 72 hours for Containment Isolation Valves (CIVs) in closed systems; (5) makes other changes to the TSs for Containment Integrity and CIVs to provide clarity to the TSs; and (6) makes other administrative changes. In addition, the TS Bases have been revised to address the proposed changes.

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,

/RA/

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

Docket No. 50-336

Enclosures: 1. Amendment No. 278 to DPR-65
2. Safety Evaluation

cc w/encls: See next page

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ACCESSION NUMBER: ML031110009

*See previous concurrence

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Millstone Power Station
Unit 2

cc:

Lillian M. Cuoco, Esquire
Senior Counsel
Dominion Resources Services, Inc.
Rope Ferry Road
Waterford, CT 06385

Edward L. Wilds, Jr., Ph.D.
Director, Division of Radiation
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

First Selectmen
Town of Waterford
15 Rope Ferry Road
Waterford, CT 06385

Charles Brinkman, Director
Washington Operations Nuclear Services
Westinghouse Electric Company
12300 Twinbrook Pkwy, Suite 330
Rockville, MD 20852

Senior Resident Inspector
Millstone Power Station
c/o U.S. Nuclear Regulatory Commission
P.O. Box 513
Niantic, CT 06357

Mr. W. R. Matthews
Senior Vice President - Nuclear Operations
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. P. J. Parulis
Manager - Nuclear Oversight
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. J. Alan Price
Site Vice President
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. John Markowicz
Co-Chair
Nuclear Energy Advisory Council
9 Susan Terrace
Waterford, CT 06385

Mr. Evan W. Woollacott
Co-Chair
Nuclear Energy Advisory Council
128 Terry's Plain Road
Simsbury, CT 06070

Ms. Nancy Burton
147 Cross Highway
Redding Ridge, CT 00870

Mr. G. D. Hicks
Director - Nuclear Station Safety and Licensing
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. S. E. Scace
Assistant to the Site Vice President
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. Chris L. Funderburk
Director, Nuclear Licensing and
Operations Support
Dominion Resources Services, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

Millstone Power Station
Unit 2

cc:

Mr. A. J. Jordan, Jr.
Director - Nuclear Engineering
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. S. P. Sarver
Director - Nuclear Station Operations
and Maintenance
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

Mr. David W. Dodson
Licensing Supervisor
Dominion Nuclear Connecticut, Inc.
Rope Ferry Road
Waterford, CT 06385

DOMINION NUCLEAR CONNECTICUT, INC.

DOCKET NO. 50-336

MILLSTONE POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 278
License No. DPR-65

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the applicant dated August 14, 2002, as supplemented on April 7, 2003, 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 Facility Operating License No. DPR-65 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 278, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance, and shall be implemented within 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

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

Attachment: Changes to the Technical
Specifications

Date of Issuance: July 25, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 278

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

Replace the following pages of the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
VII	VII
- - -	XVIII
1-2	1-2
3/4 6-1	3/4 6-1
3/4 6-10	3/4 6-10
3/4 6-11	3/4 6-11
3/4 6-15	3/4 6-15
B 3/4 6-2	B 3/4 6-2
B 3/4 6-3a	B 3/4 6-3a
B 3/4 6-3b	B 3/4 6-3b
B 3/4 6-3c	B 3/4 6-3c
B 3/4 6-3d	B 3/4 6-3d
B 3/4 6-3e	B 3/4 6-3e
- - -	B 3/4 6-3f
6-20	6-20
6-29	6-29

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 278

TO FACILITY OPERATING LICENSE NO. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

1.0 INTRODUCTION

By application dated August 14, 2002, as supplemented on April 7, 2003, Dominion Nuclear Connecticut, Inc. (the licensee), requested a change to the Millstone Power Station, Unit No. 2 (MP2) Technical Specifications (TSs). The supplement dated April 7, 2003, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on September 17, 2002 (67 FR 58640).

The proposed amendment would revise the MP2 TSs related to Containment Systems. Specifically, the proposed changes would: (1) add a new requirement for a Containment Tendon Surveillance Program to TS Section 6.0, "Administrative Controls;" (2) delete TS 3/4.6.1.6, "Containment Structural Integrity;" (3) revise TS 3/4.6.1.1, "Containment Integrity," to add a new surveillance requirement that would require that containment structural integrity be verified in accordance with the Containment Tendon Surveillance Program; (4) revise TS 3/4.6.3.1, "Containment Isolation Valves," to add a new action statement that would increase the allowed outage time (AOT) from 4 hours to 72 hours for Containment Isolation Valves (CIVs) in closed systems; (5) make other changes to the TSs for Containment Integrity and CIVs to provide clarity to the TSs; and (6) make other administrative changes. In addition, the TS Bases would be revised to address the proposed changes.

2.0 REGULATORY EVALUATION

The proposed amendment affects the MP2 TSs associated with containment integrity and the CIVs. Operability of the CIVs supports leak-tightness of the containment. Maintaining containment integrity and leak-tightness is essential for maintaining the containment leakage rate within design limits in the event of a design basis accident (DBA) consistent with the intent of General Design Criterion (GDC) 16 of Appendix A to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50. Not maintaining containment integrity or leak-tightness may result in a leakage rate in excess of that assumed in the safety analysis.

As described in Section 5.2.9.4 of the MP2 Final Safety Analysis Report (FSAR), the Containment Tendon Surveillance Program is intended to provide sufficient in-service historical

evidence to maintain a high level of confidence so that the integrity of the containment structure may be preserved. As described in the FSAR and in the licensee's submittal, the MP2 program complies with Regulatory Guide (RG) 1.35, "Inservice Inspection of UngROUTed Tendons in Prestressed Concrete Containments," Revision 3.

As described in MP2 FSAR Sections 5.2.8 and 5.2.9.1, the leak-tightness of the containment is demonstrated through testing per the requirements of Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors."

The staff also considered the following documents in performing the review of the proposed amendment:

- 1) Staff Requirements Memorandum (SRM) dated August 25, 1997;
- 2) Generic Letter (GL) 91-08, "Removal of Component Lists from the Technical Specifications;" and
- 3) NUREG-1432, Revision 2, "Standard Technical Specifications, Combustion Engineering Plants."

3.0 TECHNICAL EVALUATION

The staff has reviewed the licensee's justification for the proposed license amendment as described in the licensee's application dated August 14, 2002, as supplemented on April 7, 2003. The NRC staff's detailed evaluation is provided in Safety Evaluation (SE) Sections 3.1 through 3.13. Sections 3.1 through 3.12 of the SE correspond to proposed changes 1 through 12 respectively, as shown in Attachment 1 of the licensee's submittal dated August 14, 2002.

3.1 Proposed Change 1 - TS 1.8, "Definitions - Containment Integrity"

TS 1.8 provides the definition of when containment integrity exists. TSs 1.8.1, 1.8.2, and 1.8.3, define containment integrity with respect to penetrations, the equipment hatch, and the airlock, respectively. TS 1.8.3 currently reads as follows:

The airlock is OPERABLE pursuant to Specification 3.6.1.3.

The licensee has proposed to revise TS 1.8.3 to read as follows:

The airlock is in compliance with the requirements of Specification 3.6.1.3.

TS 3.6.1.3 provides the Limiting Condition for Operation (LCO) and Surveillance Requirements (SRs) for the containment airlock. The LCO Action Statements for TS 3.6.1.3 were revised by MP2 Amendment No. 267 to add a note that states:

Entry and exit through the containment airlock doors is permitted to perform repairs on the affected air lock components.

As discussed in the SE dated June 7, 2002, for MP2 Amendment No. 267, the note allows entry and exit through the containment air lock doors, even if the applicable action item requires the

air lock door to be closed, only for the purpose of performing repairs on the affected air lock components. As a result, there may be a short interval during access through the operable door when the containment boundary will not be intact. After each entry and exit, the door must immediately be closed. This is acceptable because, during the short period of time in which the door is expected to be open, both the probability of the occurrence of an event that could pressurize containment atmosphere and the associated risk are low.

As discussed in TS 1.6, a system, subsystem, train, component, or device shall be operable or have operability when it is capable of performing its specified functions. TS 3.6.1.3.a requires at least one of the two airlock doors to be closed for the airlock to be considered operable. Therefore, containment integrity would exist with one airlock door closed, per the current definition provided in TS 1.8.3.

The proposed change to TS 1.8.3 would define containment integrity as existing when the airlock is in compliance with the requirements of TS 3.6.1.3. No changes have been proposed to TS 3.6.1.3. The note in LCO 3.6.1.3 allows both airlock doors to be open for short periods of time while remaining "in compliance" with TS 3.6.1.3. During this short time interval, containment integrity technically does not exist since the containment boundary is not intact. However, it was not the staff's intent to require entry into the TSs for containment integrity when both doors are open pursuant to the note in LCO 3.6.1.3.

In an SRM dated August 25, 1997, the Commission provided a discussion on safety and compliance. The SRM stated that compliance simply means meeting applicable regulatory requirements (e.g., the TSs). The SRM also stated that adequate protection, which corresponds to no undue risk to public health and safety, is presumptively assured by compliance with NRC requirements. Since the proposed change will require the airlock to be in compliance with TS 3.6.1.3, and there are no changes to the current requirements in TS 3.6.1.3, the staff concludes that adequate protection will be provided with respect to containment integrity as it pertains to the airlock. Therefore, the proposed change is acceptable.

3.2 Proposed Change 2 - TS 3.6.1.1, "Primary Containment - Containment Integrity"

In the Action Statement for TS 3.6.1.1, the licensee has proposed to delete the footnote "**" that pertains to the words "CONTAINMENT INTEGRITY". The footnote currently reads as follows:

Operation within the time allowances of the ACTION statements of Specification 3.6.1.3 does not constitute a loss of CONTAINMENT INTEGRITY.

The licensee's justification for the proposed change is that the deleted note, that describes when containment integrity exists, is more clearly described by the proposed revision to TS 1.8.3 (see SE Section 3.1).

Since the words "CONTAINMENT INTEGRITY" are in capitalized type in TS 3.6.1.1, this indicates that it is a defined term contained in TS Section 1.0, "Definitions." The staff finds that TS 1.8, "CONTAINMENT INTEGRITY," including the proposed change to TS 1.8.3 described in SE Section 3.1, provides a clear description of when containment integrity exists. Therefore, deletion of footnote "**" in TS 3.6.1.1 is acceptable since the footnote is not needed to adequately define when containment integrity exists.

3.3 Proposed Change 3 - TS 3.6.1.1, "Primary Containment - Containment Integrity"

In SR 4.6.1.1.a, the licensee has proposed to change the format for footnote identifiers "*" and "***" with the identifiers "(1)" and "(2)," respectively. The staff finds that the proposed change is administrative in nature, would not result in any technical change to the current requirements, and would have no impact on safety. Therefore, the proposed changes are acceptable.

3.4 Proposed Change 4 - TS 3.6.1.1, "Primary Containment - Containment Integrity"

SR 4.6.1.1.a requires that primary containment integrity be demonstrated:

At least once per 31 days by verifying that all penetrations not capable of being closed by OPERABLE containment isolation valves and required to be closed under accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.3.1.

The licensee has proposed to add a new footnote "(3)" pertaining to SR 4.6.1.1.a that states:

Isolation devices in high radiation areas may be verified by use of administrative means.

Primary containment integrity is required in modes 1, 2, 3, and 4. Access to high radiation areas is typically restricted during these modes for "as low as reasonably achievable" (ALARA) reasons. Therefore, the probability of misalignment of these devices, once they have been verified to be in the proper position, is small. The staff finds that for isolation devices in high radiation areas, allowing verification by administrative means provides reasonable assurance that containment integrity will be demonstrated. Therefore, the proposed changes are acceptable.

3.5 Proposed Change 5 - TS 3.6.1.1, "Primary Containment - Containment Integrity"

SR 4.6.1.1.c currently requires that primary containment integrity be demonstrated:

By verifying the containment air lock is OPERABLE per Specification 3.6.1.3.

The licensee has proposed to revise SR 4.6.1.1.c to read as follows:

By verifying the containment air lock is in compliance with the requirements of Specification 3.6.1.3.

The licensee's justification for the proposed change is that it assists in determining when an entry into the TSs for containment integrity would apply.

Similar to the discussion in SE Section 3.1, since the proposed change will require the airlock to be in compliance with TS 3.6.1.3, and there are no changes to the current requirements in TS 3.6.1.3, the staff concludes that adequate protection will be provided with respect to containment integrity as it pertains to the airlock. Therefore, the proposed change is acceptable.

3.6 Proposed Change 6 - TS 3.6.1.1, "Primary Containment - Containment Integrity"

The licensee has proposed to add new SR 4.6.1.1.e that would require that primary containment integrity be demonstrated by verifying containment structural integrity in accordance with the Containment Tendon Surveillance Program. This change is associated with proposed change 7, that would delete TS 3/4.6.1.6, "Containment Structural Integrity," and proposed change 12, that would add new administrative control TS 6.25, "Pre-Stressed Concrete Containment Tendon Surveillance Program." Proposed change 6 is evaluated in SE Section 3.12.

3.7 Proposed Change 7 - TS 3.6.1.6, "Containment Structural Integrity"

The licensee has proposed to delete TS 3/4.6.1.6, "Containment Structural Integrity." This change is associated with proposed change 12 that would add new administrative control TS 6.25, "Pre-Stressed Concrete Containment Tendon Surveillance Program." Proposed change 7 is evaluated in SE Section 3.12.

3.8 Proposed Change 8 - TS 3.6.3.1, "Containment Isolation Valves"

LCO 3.6.3.1 currently reads as follows:

Each containment isolation valve shall be OPERABLE.*

The footnote "*" that pertains to the word OPERABLE currently reads as follows:

Locked or sealed closed valves may be opened on an intermittent basis under administrative controls.

The licensee has proposed to change the format for footnote identifier "*" with the identifier "(1)" and proposes to change the footnote wording to read as follows:

Containment isolation valves may be opened on an intermittent basis under administrative controls.

The proposed wording change to the footnote would essentially expand the scope of the valves that may be opened on an intermittent basis under administrative controls from locked or sealed closed CIVs to all the CIVs. The current footnote was added as part of the changes associated with MP2 Amendment No. 210 on November 19, 1997, using the guidance in GL 91-08, "Removal of Component Lists from the Technical Specifications." As noted above, the footnote applies to the word "OPERABLE" in the LCO. GL 91-08 explains that the design of locked or sealed closed valves includes positive control features to ensure they are maintained closed. Therefore, in the absence of the footnote, the opening of locked or sealed closed valves would be contrary to the operability requirements for these valves. Since opening other normally closed CIVs (i.e., CIVs that are not sealed or locked closed) would not be contrary to the operability of those CIVs, the proposed change is considered administrative in nature. Therefore, the expansion in scope from locked or sealed closed CIVs to all CIVs has no impact on safety and, therefore, is acceptable.

The staff notes that the footnote for proposed change 8 does not apply to the containment purge supply and exhaust isolation valves. As discussed in the licensee's submittal dated April 7, 2003, TS 3.6.3.2, which is unaffected by the proposed amendment, is specifically applicable to these valves. TS 3.6.3.2 requires that these valves be sealed closed in Modes 1, 2, 3, 4. Therefore, due to the more specific requirements in TS 3.6.3.2, the administrative controls in the proposed footnote for TS 3.6.3.1 that will allow containment isolation valves to be opened on an intermittent basis, will not apply to the containment purge supply and exhaust isolation valves.

3.9 Proposed Change 9 - TS 3.6.3.1, "Containment Isolation Valves"

The Action Statement for TS 3.6.3.1 currently reads as follows:

With one or more of the isolation valve(s) inoperable, either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate the affected penetration(s) within 4 hours by use of a deactivated automatic valve(s) secured in the isolation position(s), or
- c. Isolate the affected penetration(s) within 4 hours by use of a closed manual valve(s) or blind flange(s); or
- d. Be in COLD SHUTDOWN within the next 36 hours.

The licensee has proposed to change the designation for existing TS 3.6.3.1.d to TS 3.6.3.1.e, and add a new TS 3.6.3.1.d that would read as follows:

- d. Isolate the affected penetration that has only one containment isolation valve and a closed system within 72 hours by use of at least one closed and deactivated automatic valve, closed manual valve, or blind flange; or

Under the current TS 3.6.3.1 requirements, penetrations that have only one CIV and a closed system are not differentiated from penetrations that have two or more CIVs. With an inoperable CIV, any type of penetration that is affected would be required to be isolated within 4 hours in accordance with either TS 3.6.3.1.b or TS 3.6.3.1.c. The proposed new TS 3.6.3.1.d would provide an action statement specific to penetrations that have only one CIV and a closed system and would increase the AOT for isolating these type penetrations from 4 hours to 72 hours.

Attachment 1, pages 6 and 7, of the licensee's submittal dated August 14, 2002, provided the following information regarding this proposed change:

The proposed change to Technical Specifications 3.6.3.1 to add a separate AOT to isolate the affected penetration with only one CIV and a closed system within 72 hours incorporates changes in TSTF-30. This change is consistent with the required actions in the previously approved TSTF-30. General Design Criteria (GDC) 57 allows the use of a closed system in combination with a CIV to provide two containment barriers against the release of radioactive material following an accident. A closed system meets the

requirements of GDC 57, is not exposed to the containment environment and, therefore, does not constitute a potential leakage path. A closed system is subjected to a Type A containment leakage test, is missile protected, and seismic category 1 piping. A closed system also typically has flow through it during normal operation such that any loss of integrity could be continually observed through leakage detection within containment and by system walkdowns for closed systems outside containment. As such, the use of a closed system is no different from isolating a failed CIV by use of a single valve. Use of the term "closed system" for containment penetrations in Millstone Unit No. 2 design and licensing basis is not in alignment with, or committed to the requirements of, a "closed system" in the Standard Review Plan 6.2.4. Therefore, additional detail regarding closed system design will be added to the FSAR Table 5.2-11, "Containment Structure Isolation Valve Information," and Containment System descriptions, to appropriately distinguish the closed system isolation valves, and their penetrations, that are applicable to this new ACTION statement. The verification of the affected penetration flow path that is isolated would be required at least once per 31 days in Surveillance Requirement 4.6.1.1, item a. The 72 hours is considered appropriate given that certain valves may be located inside containment, the reliability of the closed system, and that 72 hours is typically provided for losing [sic] one train of redundancy throughout the Millstone Unit No. 2 Technical Specifications (e.g., AOT for restoration of one Emergency Diesel Generator is 72 hours).

The changes approved by the NRC in TSTF-30 included a revision to NUREG-1432, Revision 1, "Standard Technical Specifications, Combustion Engineering Plants," TS 3.6.3, Action C.1, to increase the AOT from 4 hours to 72 hours for isolating a penetration that has only one CIV and a closed system if the CIV is inoperable. TSTF-30 also included a revision to the TS Bases to state that the closed system must meet the requirements of Standard Review Plan (SRP) 6.2.4. The changes approved in TSTF-30 were incorporated in NUREG-1432, Revision 2.

Since the licensee's submittal dated August 14, 2002, stated that the MP2 design and licensing basis is not in alignment with, or committed to the requirements of, a "closed system" in SRP 6.2.4, the NRC staff, in a letter dated December 31, 2002, requested that the licensee provide additional information regarding how the SRP 6.2.4 requirements for a closed system differ from the MP2 design and licensing basis. The licensee's response, in the supplement dated April 7, 2003, stated, in part, that:

The change approved in TSTF-30 that permits an extended and separate AOT of 72 hours for closed system isolation valves was based upon the definition of a closed system in compliance with the SRP 6.2.4 acceptance criteria. However, the SRP 6.2.4 acceptance criteria for a closed system were established subsequent to issuance of the Millstone Unit No. 2 operating license. Consequently, the design and licensing basis associated with Millstone Unit No. 2 closed systems are not described in terms of compliance to acceptance criteria of the SRP 6.2.4. Nonetheless, all of the closed systems that DNC considers applicable to the proposed extended AOT of 72 hours fully meet the SRP 6.2.4 acceptance criteria with exception of the Reactor Building Closed Cooling Water (RBCCW) system.

The RBCCW system was originally designed as seismic Safety Class 3, and thus does not meet the acceptance criteria in SRP 6.2.4 for a Safety Class 2 (Quality Group B) design.

However, this system is a low-energy, seismically-supported system. It is required to be OPERABLE in MODES 1 through 4 and is always in operation in MODES 1 through 4. Consequently, it is a system in which the difference between Safety Class 2 and 3 in terms of fabrication and surveillance requirements is sufficiently small to maintain a basis for confidence in it remaining intact during postulated accidents. Additionally, the inherent reliability and safety of the RBCCW system design has been previously accepted by the NRC as an adequate basis for exemption from Appendix J, Type C testing, as noted in a letter dated January 15, 1991. Therefore, DNC concludes it is safe and appropriate to apply the proposed extended AOT of 72 hours to both CIVs in the RBCCW system and to closed systems that fully meet acceptance criteria of the SRP 6.2.4.

The staff reviewed the proposed new TS 3.6.3.1.d and finds that the action statement wording and AOT of 72 hours is consistent with the improved Standard Technical Specifications (STS), NUREG-1432, Revision 2, "Standard Technical Specifications, Combustion Engineering Plants," TS 3.6.3, Action C.1. Revision 2 of NUREG-1432 incorporated the change approved by the NRC in TSTF-30. The staff concludes that the proposed change is acceptable based on the following:

- 1) Based on the statements in the licensee's submittal dated April 7, 2003, all the MP2 closed systems that DNC considers applicable to the proposed AOT of 72 hours, except the RBCCW system, meet the acceptance criteria in SRP 6.2.4 for a closed system. In a letter dated January 15, 1991, the NRC issued an exemption from the Appendix J, Type C (local leak rate), testing requirements for 12 valves in the MP2 RBCCW system. The SE for the exemption concluded that for this low energy system, the difference in Safety Classes 2 and 3 is sufficiently small that there is good likelihood that the system will remain intact during an accident. Therefore, the staff concludes that there is reasonable assurance that the MP2 closed systems, applicable to proposed TS 3.6.3.1.d, are designed consistent with the considerations assumed in TSTF-30.
- 2) The AOT of 72 hours is reasonable considering the reliability of a closed system to act as a penetration isolation boundary.
- 3) In the event the affected penetration is isolated in accordance with TS 3.6.3.1.d, the affected penetration flow path must be verified to be isolated on a periodic basis in accordance with SR 4.6.1.1.a. This is necessary to assure leak tightness of containment and that containment penetrations requiring isolation following an accident are isolated.

3.10 Proposed Change 10 - TS 3.6.3.1, "Containment Isolation Valves"

The licensee has proposed to add a new footnote "(2)" pertaining to LCO 3.6.3.1 that would read as follows:

The provisions of this Specification in MODES 1, 2, and 3, are not applicable for main steam isolation valves. However provisions of Specification 3.7.1.5 are applicable for main steam isolation valves.

The licensee's submittal dated April 7, 2003, stated that:

In MODES 1, 2 and 3, the applicable requirements of the MSIVs [main steam isolation valves] are addressed in LCO 3.7.1.5, "Main Steam Line Isolation Valves."

TS Section 3.7.1.5 for MSIVs is also more restrictive than the proposed change to TS Section 3.6.3.1 for CIVs that permit an allowed outage time of 72 hours for closed system isolation valves. Therefore, the safety functions of the MSIVs are addressed by the operability requirements and restoration actions of TS Section 3.7.1.5, which remains unaffected by the proposal. In MODE 4, MSIVs are required to be operable as closed system containment isolation valves per GDC 57, and the operability requirements and restoration actions of TS Section 3.6.3.1 apply.

Since the applicable requirements for the MSIVs in Modes 1, 2, and 3, are covered by TS 3.7.1.5, the staff finds that the proposed change to TS 3.6.3.1 provides clarity and is acceptable.

3.11 Proposed Change 11 - TS 6.9.2, "Special Reports"

TS 6.9.2 provides a list of the special reports that must be submitted to the NRC pursuant to other TS requirements. TS 6.9.2.i currently requires that a special report on degradation of the containment structure be submitted pursuant to TS 4.6.1.6.4. The licensee has proposed to revise TS 6.9.2.i to replace the existing special report requirement with a tendon surveillance report that would be submitted pursuant to TS 6.25. This change is associated with proposed change 7, that would delete TS 3/4.6.1.6, "Containment Structural Integrity," and proposed change 12 that would add new administrative control TS 6.25, "Pre-Stressed Concrete Containment Tendon Surveillance Program." Proposed change 11 is evaluated in SE Section 3.12.

3.12 Proposed Change 12 - TS 6.25, "Pre-Stressed Concrete Containment Tendon Surveillance Program"

Proposed change 12 would revise TS Section 6.0, "Administrative Controls," to add new TS 6.25, "Pre-Stressed Concrete Containment Tendon Surveillance Program." As discussed in SE Sections 3.6, 3.7, and 3.11, proposed changes 6, 7, and 11, are all related to proposed change 12. Proposed change 7 would delete TS 3/4.6.1.6, "Containment Structural Integrity." The current requirements in TS 3/4.6.1.6 would essentially be replaced by the requirements in proposed changes 6, 11, and 12. Proposed change 6 would add new SR 4.6.1.1.e that would require that primary containment integrity be demonstrated by verifying containment structural integrity in accordance with the Containment Tendon Surveillance Program. Proposed change 11 would revise the special report submittal requirements specified in TS 6.9.2.i from a report on degradation of the containment structure (required by current TS 4.6.1.6.4) to a tendon surveillance report (required by proposed TS 6.25).

Proposed TS 6.25 would read as follows:

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline

measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Regulatory Guide 1.35, Revision 3, 1989.

The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken. This Tendon Surveillance Report is an administrative requirement listed in Technical Specifications 6.9.2, "Special Reports."

The NRC staff reviewed the proposed changes to the TSs related to containment structural integrity and found that the elements contained in the proposed TSs are acceptable on the basis of the following requirements: (1) the containment structural integrity will be maintained via the provision of proposed SR 4.6.1.1.e; (2) the tendon surveillance program, inspection frequencies, and acceptance criteria will be in accordance with RG 1.35, Revision 3; and (3) any abnormal degradation detected during the tests required by the program will be reported to the NRC. Furthermore, the proposed changes are consistent with NUREG-1432, Revision 2, "Standard Technical Specifications, Combustion Engineering Plants."

3.13 Technical Evaluation Conclusion

Based on the preceding evaluation, the staff concludes that there is reasonable assurance that the proposed changes described in SE Sections 3.1 through 3.12 will not adversely affect the integrity and leak-tightness of the containment. Therefore, the proposed changes are acceptable. The licensee has also proposed to revise the TS Bases to address the proposed changes. The staff has no objections to these Bases changes.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The amendment also changes recordkeeping, reporting, or administrative procedures, or requirements. 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 such finding (67 FR 58640). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9)

and 10 CFR 51.22(c)(10). 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) 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: R. Ennis

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