

September 4, 2003

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

FROM: Victor Nerses, Sr. Project Manager, Section 2A /RA/  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 3, FACSIMILE  
TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION  
(RAI) TO BE DISCUSSED IN AN UPCOMING CONFERENCE CALL  
(TAC NO. MB8387)

The attached draft RAI was transmitted by facsimile on September 4, 2003, to Mr. Ravi Joshi, Dominion Nuclear Connecticut, Inc. (licensee). This draft RAI was transmitted to facilitate the technical review being conducted by the Office of Nuclear Reactor Regulation (NRR), and to support a conference call with the licensee to discuss the RAI. The RAI was related to the licensee's submittal dated April 7, 2002, concerning the additions to the Core Operating Limits Report.

As a result of a prior telecom (to discuss a draft RAI dated May 21, 2003) between NRR and the licensee on August 7, 2003, NRR considered additional information was needed. Therefore, the draft RAI dated May 21, 2003, which consisted of 5 questions, was re-written to include a question 6. Review of the RAI would allow the licensee to determine and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket No. 50-423

Attachment: Draft RAI

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| DATE   | 09/04/03 | 09/04/03 |

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# DRAFT

REQUEST FOR ADDITIONAL INFORMATION  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS  
ADDITIONS TO THE CORE OPERATING LIMITS REPORT  
FACILITY OPERATING LICENSE NO. NPF-49  
DOMINION NUCLEAR CONNECTICUT, INC  
MILLSTONE POWER STATION, UNIT NO. 3  
DOCKET NO. 50-423  
(TAC NO. MB8387)

By letter dated April 7, 2003, Dominion Nuclear Connecticut, Inc. (the licensee) submitted a proposed amendment to the Technical Specifications (TS) for Millstone Unit 3. The proposed amendment would relocate some TS to the Core Operating Limits Report (COLR).

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed changes to the TS. In order for the staff to complete its evaluation, the following additional information is requested:

1. In Generic Letter 88-16 entitled, "Removal of Cycle-Specific Parameter Limits from Technical Specifications," the NRC established a generic process that eliminated the need to modify the technical specifications to update cycle-specific parameters. A central element of the process included the addition of a COLR to include cycle-specific parameters and NRC-approved methodologies. A licensee may add approved methodologies to the COLR list using the standard technical specification modification process. When the staff reviews licensee requests to relocate technical specifications to the COLR, it uses two important conditions to determine acceptability. These two conditions are the following: 1) Is the parameter cycle specific? and 2) Is there an NRC approved methodology which calculates the parameter in an acceptably conservative manner? The staff requests that the licensee provide a detailed discussion of how refueling boron concentration meets the two conditions.
2. During refueling, the reactor cavity, the transfer canal and the spent fuel pool form a single connected mass. Please describe the steps taken to ensure that there will not be a dilution event in either the reactor cavity or the spent fuel pool. How will you ensure that the concentrations are the same in the reactor cavity and the spent fuel pool?
3. WCAP-8301 is requested to be added to the TS list of COLR documents. Methodologies added to the COLR must be reviewed and approved. WCAP-8301 does not have the "-A" designation. Is this a reviewed and approved methodology? If so, please provide reference to the staff safety evaluation and provide justification for its use at Millstone 3. Include the date and the code revision that you plan to use.
4. WCAP-10054-P-A was requested to be added to the TS list of COLR documents. This report has been reviewed and approved by the NRC. However, no specific evaluation was included to document its applicability to Millstone 3. Please provide justification for its use at Millstone 3. If it has been used previously, please provide reference to the staff approval for use at your plant. The safety evaluation includes the condition that "The generic submittal include validation that the limiting break location has not shifted

away from the cold legs to the hot or pump suction legs.” Please include the date and the code revision that you plan to use.

5. WCAP-8745-P-A was requested to be added to the TS list of COLR documents. This report has been reviewed and approved by the NRC, however no specific evaluation was included to document its applicability to Millstone 3. Does your plant operate under constant axial offset control?
6. Page 1 of Attachment 1 of the licensee’s submittal states that the proposed changes are consistent with the changes included in TS Task Force Traveler (TSTF)-339, Revision 2. Specifically the proposed changes relocates several TS parameters to the COLR consistent with WCAP-14483. Identify and justify any deviation from TSTF-339, Revision 2 for its use at Millstone 3 The licensee has indicated that