

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
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July 7, 2004

Mr. L. Raynard Wharton
Spent Fuel Project Office, NMSS
U.S. Nuclear Regulatory Commission
11555 Rockville Pike MIS 013-D -13
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Serial No.	04-341
MPS Lic/TJS	R3
Docket No.	72-47

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION
INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)
INFORMATION RELATED TO THE REVIEW PRIORITY FOR
NUHOMS CERTIFICATE OF COMPLIANCE: NO. 1004, AMENDMENT NO. 9

In a letter dated April 21, 2004 from Transnuclear Inc. (TN) to the Nuclear Regulatory Commission (NRC) Spent Fuel Project Office, TN applied for Amendment No. 9 of the NUHOMS Certificate of Compliance (CoC) No. 1004 for Dry Spent Fuel Storage Casks. The proposed Amendment 9 includes Technical Specification changes for the NUHOMS 32PT that revises Fuel Specification Table 1-1g to allow a variable soluble boron loading as a function of fuel enrichment. Specifically, proposed Table 1-1g establishes a minimum value of 1800 ppm of soluble boron for CE 14x14 fuel with zero Poison Rod Assemblies (PRA) and 3.35 wt % U-235 initial enrichment.

Dominion Nuclear Connecticut (DNC), Inc, is in the process of designing and installing an onsite Independent Spent Fuel Storage Installation (ISFSI) for the Millstone Power Station. DNC has contracted with TN to provide the dry spent fuel storage casks for this ISFSI. We prefer that the first five dry shielded canisters (DSC) scheduled to be loaded at Millstone contain spent fuel of less than 3.35 wt % U-235 initial enrichment with no PRAs. A minimum value of 1800 ppm soluble boron would be required for loading 3.35 wt % U-235 fuel per Amendment 9. However, existing TN 32PT Technical Specifications require a minimum 2500 ppm of soluble boron for the same conditions due to the bounding nature of the criticality calculations. Typical Millstone Unit 2 spent fuel pool (SFP) boron concentrations are approximately 2100 ppm.

Without NRC approval of Amendment 9, the existing Technical Specifications for the 32PT DSC will require the soluble boron concentration for the Millstone Unit 2 SFP to be increased from the current nominal value of 2100 ppm to > 2500 ppm to facilitate loading of any of our available spent fuel. Dilution of the SFP boron concentration would then be necessary prior to commencing the planned refueling outage in order to avoid mixing between the SFP and other plant systems where a high boron concentration is not consistent with the unit's design basis. Manipulating the SFP boron concentration is not desirable given the limited time available for cask loading prior to the refueling

outage. Additionally, processing the water volumes required to support this evolution has the potential to generate additional radwaste effluents that might otherwise be avoided.

The application for Amendment 9 submitted by TN requested a February 2005 issuance date based on identified facility need dates. However, Amendment 9 also facilitates the implementation of the Millstone ISFSI project and as such, DNC requests NRC complete its review of the requested amendment prior to December 2004. This date supports the planned loading of two storage casks for the Millstone Unit 2 Spring 2005 refueling outage. It is necessary to load these casks prior to the refueling outage in order to preserve full core offload capability following the refueling outage.

If you have any questions or require additional information, please contact Mr. Thomas Szymanski at (804) 273-3065.

Very truly yours,

A handwritten signature in black ink, appearing to read 'E. S. Grecheck', with a stylized, flowing script.

E. S. Grecheck
Vice President – Nuclear Support Services

Attachments: (0)

Commitments made in this letter: None.

cc: U.S. Nuclear Regulatory Commission
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