



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 22, 2011

Mr. David A. Heacock  
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. 3 - SUPPLEMENTAL  
INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING  
ACTION RE: RELOCATION OF TECHNICAL SPECIFICATION SURVEILLANCE  
FREQUENCIES (TAC NO. ME6695)

Dear Mr. Heacock:

By letter dated July 5, 2011,<sup>1</sup> Dominion Nuclear Connecticut, Inc. (DNC or the licensee) submitted a license amendment request for Millstone Power Station, Unit No. 3 (MPS3). The proposed amendment would relocate certain technical specification (TS) surveillance frequencies to a licensee-controlled program by adopting Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies of Licensee Control – Risk-Informed Technical Specification Task Force Initiative 5b." The proposed change would also add a new program, the Surveillance Frequency Control Program (SFCP), to the TSs, in accordance with TSTF-425. TSTF-425<sup>2</sup> is approved for use by the U.S. Nuclear Regulatory Commission (NRC) and was announced in the *Federal Register* on July 6, 2009 (74 FR 31996).

The purpose of this letter is to provide the results of the NRC staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the NRC staff to make an independent

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML11193A225

<sup>2</sup> ADAMS Accession No. ML090850642

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assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that DNC supplement the application to address the information requested in the enclosure by September 7, 2011. This will enable the NRC staff to complete its detailed technical review. If the information responsive to the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR 2.101, and the NRC staff will cease its review activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

The requested information and associated time frame was discussed with Mr. Bill Bartron of your staff on August 12, 2011.

If you have any questions, please contact me, at (301) 415-1603.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carleen J. Sanders', is written over the typed name.

Carleen J. Sanders, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosure: As stated

cc w/encl: Distribution via Listserv

OFFICE OF NUCLEAR REACTOR REGULATION  
ACCEPTANCE REVIEW – UNACCEPTABLE WITH OPPORTUNITY TO SUPPLEMENT  
LICENSE AMENDMENT REQUEST  
RELOCATE TECHNICAL SPECIFICATION SURVEILLANCE FREQUENCIES  
MILLSTONE POWER STATION, UNIT NO. 3  
DOMINION NUCLEAR CONNECTICUT, INC.

DOCKET NO. 50-423

By letter dated July 5, 2011,<sup>1</sup> Dominion Nuclear Connecticut, Inc. (DNC or the licensee) submitted a license amendment request for Millstone Power Station, Unit No. 3 (MPS3). The proposed amendment would relocate certain technical specification (TS) surveillance frequencies to a licensee-controlled program by adopting Technical Specification Task Force (TSTF)-425, Revision 3, "Relocate Surveillance Frequencies of Licensee Control – Risk-Informed Technical Specification Task Force Initiative 5b." The proposed change would also add a new program, the Surveillance Frequency Control Program (SFCP), to the TSs, in accordance with TSTF-425. TSTF-425<sup>2</sup> is approved for use by the U.S. Nuclear Regulatory Commission (NRC) and was announced in the *Federal Register* on July 6, 2009 (74 FR 31996).

The acceptance review is performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant. The acceptance review has a lesser scope as compared to the detailed technical review. The issues discussed below were identified during the lesser scope of the acceptance review and lead the NRC staff to believe that more issues of this nature may exist throughout DNC's request. As such, the NRC staff requests that DNC complete a thorough review of the proposed changes to make sure that only the surveillance requirements meeting the specification as described below (and in TSTF-425 and the *Federal Register* Notice) are being relocated from the TSs. The NRC staff also requests, that once this review is complete that DNC submit a supplement to the July 5, 2011, letter with new marked-up TS pages. These new pages should correct, at a minimum, the issues identified below.

When implemented, TSTF-425 relocates most periodic TS surveillance frequencies to a licensee-controlled program. The following TS surveillance frequencies cannot be relocated:

- Frequencies that reference other approved programs for the specific interval (such as Inservice Testing Program or the Primary Containment Leakage Rate Testing Program);
- Frequencies that are purely event-driven (e.g., "Each time the control rod is withdrawn to the 'full out' position");

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<sup>1</sup>Agencywide Documents Access and Management System (ADAMS) Accession No. ML11193A225

<sup>2</sup> ADAMS Accession No. ML090850642

Enclosure

- Frequencies that are event-driven but have a time component for performing the surveillance on a one-time basis once the event occurs (e.g., "within 24 hours after thermal power reaching  $\geq 95\%$  RTP [rated thermal power]"); and
- Frequencies that are related to specific conditions (e.g., battery degradation, age, and capacity) or conditions for the performance of a surveillance requirement (e.g., "drywell to suppression chamber differential pressure decrease").

Attachment 3 of the July 5, 2011, letter provided the MPS3 marked-up TS pages. These mark-ups are the proposed changes associated with this request.

TS Table 4.3-3, "Radiation Monitoring Instrumentation for Plant Operations Surveillance Requirements," includes the MODES of applicability. Only surveillance frequencies meeting the requirements discussed above may be relocated. Any unique information, such as the MODES of applicability, must be maintained in the MPS3 TSs. Currently the entire table is proposed to be removed.

TS Table 4.3-6, "Remote Shutdown Monitoring Instrumentation Surveillance Requirements," does not require a channel calibration of the Reactor Trip Breaker Indication instrument. The table also includes a note on Function No. 14, Source Range Count Rate, stating that the channel check is required below P-6 (intermediate range neutron flux interlock setpoint). Only surveillance frequencies meeting the requirements discussed above may be relocated. Any unique information must be maintained in the MPS3 TSs. Currently DNC is proposing to remove the entire table.

TS Table 4.3-7, "Accident Monitoring Instrumentation Surveillance Requirements," contains two notes regarding the channel calibrations (not the frequency of the channel calibration). Only surveillance frequencies meeting the requirements discussed above may be relocated. Any unique information must be maintained in the MPS3 TSs. Currently DNC is proposing to remove the entire table.

TS Table 4.7-1, "Secondary Coolant System Specific Activity Sample and Analysis Program," requires Isotopic Analysis for Dose Equivalent I-131 Concentration at varying frequencies dependent on the Gross Radioactivity Determination. The threshold cannot be relocated and must be retained in TSs. Currently DNC is proposing to remove the entire table.

TS SR 4.1.1.1.2.1(b), describes some of the requirements associated with an inoperable control rod(s). The SR is event-driven with a time component requiring that shutdown margin shall be determined acceptable, with increased allowance for the withdrawn worth of the immovable or untrippable control rod(s), with consideration for several factors every 24 hours. Currently DNC is proposing to relocate this event-driven SR.

In addition, DNC is proposing to make changes outside of the scope of the model submittal (74 FR 31996). These additional changes were not addressed in the Significant Hazards Consideration. Please submit a supplement to the Significant Hazards Consideration to address these additional changes.

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assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment.

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If you have any questions, please contact me, at (301) 415-1603.

Sincerely,

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Carleen J. Sanders, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosure: As stated

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