



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

March 8, 2013

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 3 - SECOND REQUEST FOR
ADDITIONAL INFORMATION TO SUPPORT REVIEW OF AMENDMENT
APPLICATION REGARDING RISK INFORMED JUSTIFICATION FOR THE
RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS
TO LICENSEE CONTROLLED PROGRAM (TAC NO. ME9733)

Dear Mr. Heacock:

The Millstone Power Station Unit 3 submitted a license amendment request to adopt Technical Specification Task Force - 425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – Risk-Informed Technical Specification Task Force (RITSTF) Initiative 5b" (Agencywide Documents Access Management Systems (ADAMS) ML12284A213), dated October 4, 2012. The staff issued a request for additional information (RAI) letter (ADAMS ML12342A380), dated December 18, 2012, and has reviewed the licensee's responses to the RAI provided in a letter (ADAMS ML13008A328), dated January 4, 2013.

The U.S. Nuclear Regulatory Commission staff's review of the RAI responses has determined that further information is necessary to evaluate the technical adequacy of the licensee's submittal. The second RAI on the licensee's submittal is provided in the enclosure. A response to this RAI is requested to be provided within 45 days.

If you have any questions regarding this matter, please contact me at 301-415-4125.

Sincerely,

A handwritten signature in black ink, appearing to read "James Kim", is written above the typed name.

James Kim, Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosure:
As stated

cc w/encl: Distribution via Listserv

SECOND REQUEST FOR ADDITIONAL INFORMATION RELATED TO AN AMENDMENT TO
ADOPT TECHNICAL SPECIFICATIONS TASK FORCE TREVELLER TSTF-425, REVISION 3,
TO RELOCATE SPECIFIC SURVEILLANCE FREQUENCIES
TO A LICENSEE CONTROLLED PROGRAM
MILLSTONE POWER STATION UNIT 3
DOCKET NO. 50-423

Question 1

The response to Question 5 of the request for additional information (RAI), dated January 4, 2013, discussed a process and noted a procedure. However, the response is future-looking, and the question is related to what has been done to-date to support the application. The original question is repeated:

Gap #2. The disposition of this supporting requirements states this is a documentation issue only; however, no discussion is provided on the plant walkdowns and interviews mentioned in the supporting requirement. Please discuss these walkdowns and interviews which address this supporting requirement (SR).

Question 2

The response to Question 6 of the RAI, dated January 4, 2013, states that Gap #3 (HR-G5) is based on outdated (circa 2006) talk-through documentation with Operations, and proposes to perform a sensitivity analysis on human error probabilities (HEPs) in lieu of updating operator survey information to support the basis for revised or new human failure events. The license amendment request proposes to use a sensitivity analysis using an a-prior multiple of 10; however, this a-prior approach cannot be known to represent a bounding sensitivity analyses for the HEPs. Therefore, since the last update to the HEPs which considered operator survey information was performed a long time ago, either complete the talk-throughs or provide assurance that the HEPs will be treated in a bounding manner.

Question 3

In response to Question 7 of the RAI, dated January 4, 2013, it is noted that the MPS3 probabilistic risk assessment (PRA) Internal Flooding notebook states:

“Thus, only equipment within the area that may be affected by spray or jet impingement damage are assumed to fail, and there is no propagation to other areas and no damage due to submersion.”

Provide justification for the assumption that action can be taken such that there is no propagation or submersion.

Enclosure

Question 4

Gap #9 is related to the potential for flood barrier unavailability and flood pathways through floor drain check valves. Please discuss your assessment and the risk significance of the flood barrier unavailability and the floor drain check valves for the application in more detail, as well as planned updates, if necessary, to the flood PRA model based on the assessment.

Question 5

For fire events and external events risk assessment, responses to Questions 10 and 11 of the RAI, dated January 4, 2013, state that information from the Millstone Individual Plant Examination of External Events (IPEEE) report will be screened. In addition, the responses to Questions 10 and 11 of the previous RAI indicate that the IPEEE information will be qualitatively assessed.

- a. Please clarify which methods (e.g., an IPEEE method or other) would be used if a bounding analysis is to be performed for fire events or external events.
- b. If a bounding analysis is to be performed for fire events or external events, discuss steps of your analysis process which help to ensure the analysis is bounding and considers the current plant configuration and operation

Question 6

SR 4.2.4.2 is only performed if >75% power AND one power range channel is inoperable (Frequencies that are related to specific condition) and cannot be relocated to the Surveillance Frequency Control Program (SFCP). Also Table 4.7.1, Secondary Coolant System Specific Activity Sample and Analysis Program, proposes to relocate a "Program Frequency" to the SFCP. This is prohibited because it is a program requirement (Frequencies that reference other approved programs for the specific interval). And even if they could be relocated, note that 2(a) and (b) are conditional (SR performance is dependent upon on (1) Gross Radioactivity Determination SR results. I had a similar issue with the Oconee TSTF-425 license amendment request where the licensee proposed relocating an Oconee TS Chapter 5 component "test interval," that is located in the Standard Technical Specification (Section 3, Surveillance), to the SFCP.

Question 7

The response to Question 13 of the RAI, dated January 4, 2013, is unacceptable. The Frequency (the "when") can be located in the SFCP - NOT the Surveillance Requirement ("what" is being tested) i.e., "each train shall be tested." This is very clearly identified in the *FR* Notice for Availability. The frequency (62 days) and the reference to the staggered test basis can be replaced by "the frequency specified in the Surveillance Frequency Control Program," as the licensee identified in the RAI response.

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/RA/
James Kim, Project Manager
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cc w/encl: Distribution via Listserv

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G. Waig, NRR

ADAMS Accession No.: ML13059A329 *via memo dated February 14, 2013

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