



December 9, 2013

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Serial No. 13-623  
NSSL/TGC R0  
Docket No. 50-423  
License No. NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 3**  
**REPLY TO A NOTICE OF VIOLATION VIO 05000423/2013004-01**

Pursuant to the provisions of 10 CFR 2.201, Dominion Nuclear Connecticut, Inc. (DNC) herein provides a reply to NRC letter dated November 8, 2013 regarding the failure to restore compliance within a reasonable time for the Millstone Power Station Unit 3 (MPS3) feedwater isolation valves.

Enclosure 1 provides DNC's response to the violation of NRC requirements specified in the Notice of Violation VIO 05000423/2013004-01. This enclosure provides: (1) the reason for the violation, (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken, and (4) the date when full compliance will be achieved.

If you have any questions or require further information, please contact Mr. William D. Bartron at (860) 444-4301.

Sincerely,

Daniel G. Stoddard  
Senior Vice President – Nuclear Operations

Enclosure:

1. Reply to a Notice of Violation VIO 05000423/2013004-01

Commitments made in this letter:

1. DNC will complete a modification that will correct the degraded closing capability of the MPS3 main feedwater isolation valves prior to the restart from refueling outage 3R16.

IEOI  
RGM I

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**Enclosure 1**

**REPLY TO A NOTICE OF VIOLATION**  
**VIO 05000423/2013004-01**

**MILLSTONE POWER STATION UNIT 3  
DOMINION NUCLEAR CONNECTICUT, INC.**

## **NOTICE OF VIOLATION**

*"During an NRC inspection conducted between July 1 and September 30, 2013 a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:*

*10 CFR 50 Appendix B, Criterion XVI, "Corrective Action," requires, in part, that measures shall be established to assure that conditions adverse to quality are promptly identified and corrected.*

*Contrary to the above, from 2007 until the present, Dominion failed to correct the degraded closing capability of the Unit 3 main feedwater isolation valves and has not restored compliance within a reasonable period of time. Specifically, following Dominion's initial documentation of the issue in 2007, and the subsequent inspectors' documentation of the corrective action violation in inspection report 05000423/2012010, Dominion has since deferred repairs until the October 2014 outage.*

*This violation is associated with a Green SDP finding."*

## **Response to Notice of Violation**

### **1) Reason for the violation, or, if contested, the basis for disputing the violation or severity level**

Dominion Nuclear Connecticut, Inc. (DNC) concurs with the violation as stated.

The reason for the violation is that DNC did not appropriately plan for a project of the scope and complexity required. Critical tasks to support resolution and due dates for these tasks were not sufficiently developed, defined, and tracked. Key dates were missed due to changes in the scope of work based on more complex corrective actions than originally planned.

In 2007, a discrepancy was identified in the closing calculations associated with 3FWS\*CTV41A/B/C/D, Steam Generator Feedwater Isolation Trip Valves. An Operability Determination determined the valves were Operable but Not Fully Qualified. At that time, it was believed that the issue could be resolved without a physical modification in the plant.

Later, it was determined that a physical modification was required to correct the condition (installation of new valve actuators). The scope and complexity of this project was not fully recognized initially and thus did not receive adequate project management. Critical tasks including design details, funding, material purchases and deliveries, vendor engineering documentation, and project implementation scheduling were not sufficiently developed, defined, or tracked.

In 2012, the NRC conducted a Problem Identification & Resolution inspection, and issued Green Non-cited Violation (NCV) 05000423/2012010-01 because DNC had not implemented actions to close the open Operability Determination in a timely manner. To address the NCV, DNC conducted an apparent cause evaluation (ACE), which identified the cause as discussed above. At that time, the project completion was targeted for the spring 2013 refueling outage (3R15).

Subsequent to the approval of the ACE, internal design reviews commenced and an independent design organization was commissioned to review the project. Additional technical concerns with the proposed design were identified, and as a result of these concerns, the project implementation was delayed for an additional fuel cycle to 3R16 (fall 2014).

## **2) Corrective steps that have been taken and the results achieved**

A design modification was approved on November 5, 2013 that will correct the degraded closing capability of the steam generator feedwater isolation trip valves. As a result, critical tasks to support implementation of the design change have been developed and defined. The newly specified outage milestones for this project have been met to date.

## **3) Corrective steps that will be taken**

DNC will complete the design modification to correct the degraded closing capability of the MPS3 main feedwater isolation valves according to the project plan. Critical tasks to support implementation of the design change are being tracked.

## **4) Date when full compliance will be achieved**

Full compliance will be achieved when DNC completes the modification that will correct the degraded closing capability of the MPS3 main feedwater isolation valves prior to the restart from refueling outage 3R16 (fall 2014).