

Serial No. 13-621  
NSSL/MLC R0  
Docket No. 50-423  
License No. NPF-49

A001  
L12R

Commitments made in this letter: None

Attachment:

Response to Request for Additional Information Regarding License Amendment  
Request to Revise Technical Specification 6.8.4.f for Peak Calculated Containment  
Internal Pressure

cc: U.S. Nuclear Regulatory Commission  
Region I  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

J. S. Kim  
Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint North, Mail Stop 08-C2A  
11555 Rockville Pike  
Rockville, MD 20852-2738

NRC Senior Resident Inspector  
Millstone Power Station

Director, Radiation Division  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

**ATTACHMENT**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING  
LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION  
6.8.4.F FOR PEAK CALCULATED CONTAINMENT INTERNAL PRESSURE**

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

By letter dated April 25, 2013, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 3 (MPS3). The proposed amendment would revise the peak calculated containment internal pressure for the design basis loss of coolant accident (LOCA) described in Technical Specification (TS) 6.8.4.f, "Containment Leakage Rate Testing Program." The peak calculated containment internal pressure,  $P_a$ , would increase from 41.4 psig to 41.9 psig. In a letter dated August 8, 2013, the Nuclear Regulatory Commission (NRC) transmitted a request for additional information (RAI) to DNC related to the LAR. DNC responded to the RAI in a letter dated September 19, 2013. In a letter dated November 6, 2013, the NRC transmitted another RAI. This attachment provides DNC's response to the NRC's RAI.

### **Question EEEB-1**

*In the LAR, the licensee states the following:*

*Change in  $P_a$  does not affect environmentally qualified equipment.*

*The containment temperatures, using the corrected large break LOCA mass and energy (M&E) releases, remain within the bounding containment temperature profile used to qualify equipment.*

- a. Provide a discussion of the Environmental Qualification (EQ) re-analysis performed to show that the equipment remained qualified. In addition, provide a comparison of the EQ overlays with containment temperature and pressure profiles.*
- b. Explain how margins are being maintained for qualified equipment in accordance with 10 CFR 50.49.*

### **DNC Response**

- a. The EQ bounding temperature profile taken from the MPS3 Environmental Specification (SP-M3-EE-0333) is used for the environmental qualification of plant equipment. The most limiting LOCA for peak containment pressure and temperature is a double-ended guillotine break of the hot leg. The containment peak pressure for this break has resulted in the current request to increase  $P_a$ . Figure 1 shows that the EQ bounding temperature profile envelopes the containment temperature profile from the double-ended hot leg break analysis. Therefore, there is no impact on the existing MPS3 EQ program, and the EQ program remains in compliance with 10 CFR 50.49.

Similarly, the EQ bounding pressure profile taken from the MPS3 Environmental Specification (SP-M3-EE-0333) is used for the environmental qualification of plant equipment. Figure 2 shows that the EQ bounding pressure profile envelopes the

containment pressure profile from the double-ended hot leg break analysis. Therefore, there is no impact on the existing MPS3 EQ program, and the EQ program remains in compliance with 10 CFR 50.49.

- b. Temperature and pressure margins in the MPS3 EQ program are applied in accordance with 10 CFR 50.49 and Regulatory Guide 1.89. These margins are applied in addition to the EQ bounding (SP-M3-EE-0333) temperature and pressure profiles for equipment qualified to 10 CFR 50.49. This combination of EQ bounding profiles plus temperature and pressure margins is considered bounded by the MPS3 equipment test profiles, which are tested to harsher environmental conditions. Therefore, there is no impact on the existing MPS3 EQ program.

**Figure 1**

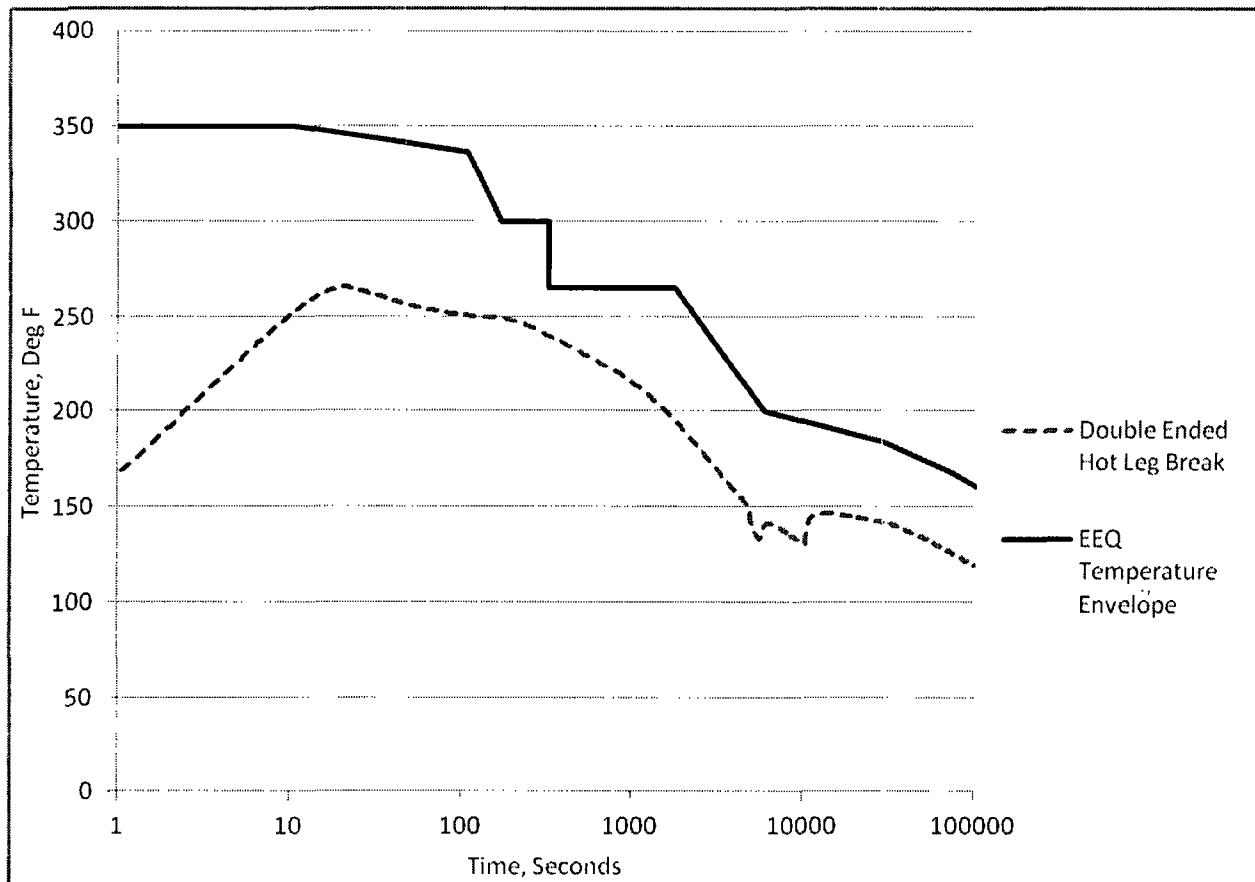
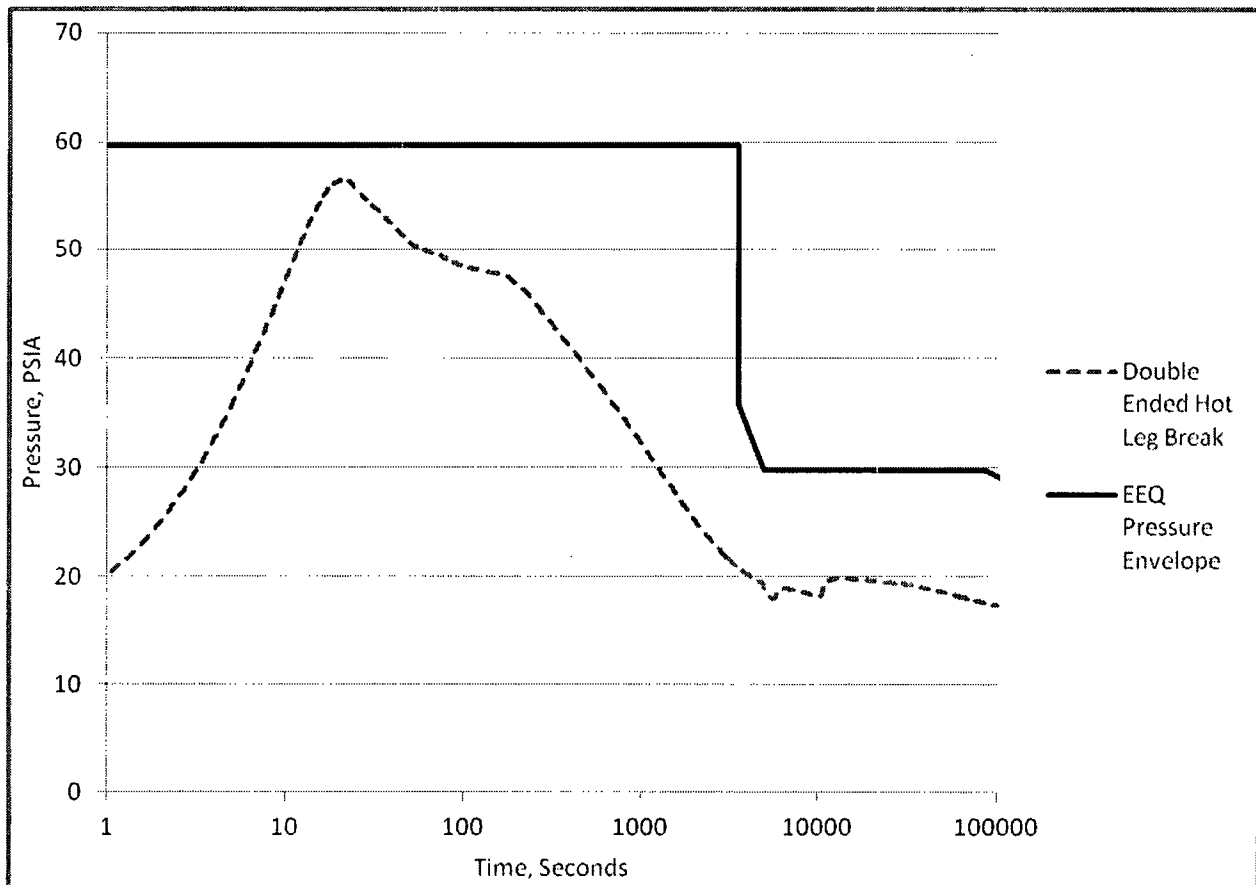


Figure 2



**Question EEEB-2**

*Provide a discussion on any impact of the proposed change on areas of the plant outside of containment (e.g., changes to EQ parameters such as temperature and pressure).*

**DNC Response**

The proposed change in calculated peak containment internal pressure for the design basis loss of coolant accident does not result in any impact on any area of the plant outside containment. As a result, environmental conditions outside containment remain bounded by existing site calculations.