



March 28, 2014

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

Serial No 14-037  
NSSL/MLC R0  
Docket No. 50-423  
License No. NPF-49

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 3**  
**LICENSE AMENDMENT REQUEST FOR ADMINISTRATIVE CHANGES AND**  
**CORRECTIONS TO THE TECHNICAL SPECIFICATIONS**

In accordance with the provisions of 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) is submitting a license amendment request to revise the Millstone Power Station Unit 3 (MPS3) Technical Specifications (TSs). The proposed changes delete the TS Index and make administrative corrections to the TSs.

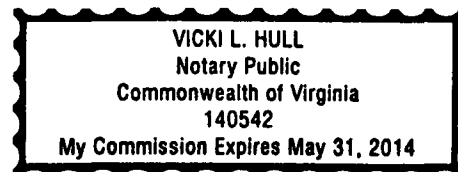
Attachment 1 to this letter provides a description and evaluation of the proposed changes. Attachment 2 contains the TS page mark-ups of the proposed changes. The proposed changes do not involve a Significant Hazards Consideration under the standards set forth in 10 CFR 50.92. The Facility Safety Review Committee has reviewed and concurred with the determinations herein.

In accordance with 10 CFR 50.91(b), a copy of this license amendment request is being provided to the State of Connecticut.

Should you have any questions in regard to this submittal, please contact Wanda Craft at (804) 273-4687.

Sincerely,

Mark D. Sartain  
Vice President – Nuclear Engineering



COMMONWEALTH OF VIRGINIA )  
 )  
COUNTY OF HENRICO )

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain, who is Vice President - Nuclear Engineering of Dominion Nuclear Connecticut, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of that company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 28<sup>TH</sup> day of March, 2014.

My Commission Expires: May 31, 2014

  
Notary Public

A001  
NCC

Attachments:

1. Evaluation of Proposed License Amendment
2. Marked-Up Technical Specification Pages

Commitments made in this letter: None

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**ATTACHMENT 1**

**EVALUATION OF PROPOSED LICENSE AMENDMENT**

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

## **EVALUATION OF PROPOSED LICENSE AMENDMENT**

### **1.0 SUMMARY**

In accordance with the provisions of 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) is submitting a license amendment request (LAR) to revise the Millstone Power Station Unit 3 (MPS3) Technical Specifications (TSs). The proposed changes delete the TS Index and make administrative corrections to the TSs.

### **2.0 PROPOSED CHANGES**

DNC proposes to make the following changes to the MPS3 TSs:

- a) Delete TS index pages i through xix.
- b) Replace the first sub-letter under TS Table 4.3-2 Item 4, Steam Line Isolation – Manual Initiation,” which currently appears as sub-letter “d” on Page 3/4 3-37, with sub-letter “a”.
- c) Revise TS 6.3.2, Facility Staff Qualifications, from:  
  
“If the operations manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the operations manager shall have held a senior reactor operator license at a pressurized water reactor, and the assistant operations manager shall hold a senior reactor operator license for Millstone Unit No. 3.”  
  
to:  
  
“The operations manager or at least one operations middle manager shall hold a senior reactor operator license for Millstone Unit No. 3.”
- d) Replace the term “SORC” in paragraph b of the “Licensee initiated changes to the REMODCM,” described in TS 6.13 with the term “FSRC.”

Mark-ups of the affected TS pages for the proposed changes described above are provided in Attachment 2.

### **3.0 TECHNICAL EVALUATION**

The technical justification for each of the changes proposed in Section 2.0 of this LAR is provided below:

- a) This LAR proposes to delete the index from the MPS3 TSs. Past LAR submittals to the NRC have included the TS index to support requested TS changes, and a revised index has been included in issued amendments. This change will eliminate

the need to include TS index pages as part of LAR submittals for future TS changes and to issue revised index pages with an amendment. Although the index would no longer be considered part of the MPS3 TSs, controlled copy holders would continue to receive updates to the TS index for future TS and TS Bases changes.

The TS index identifies the contents of the TSs and where the specific TS sections can be found throughout the TSs but does not contain any technical information required by 10 CFR 50.36. Therefore, this is an administrative change and does not involve any physical changes to structures, systems, or components (SSCs) in the plant, or the way SSCs are operated or controlled.

Similar amendments to remove the TS index were approved for Seabrook in June 2013 (Reference 1), Waterford Unit 3 in May 2005 (Reference 2), and for Arkansas Nuclear One, Unit 2 in June 2005 (Reference 3).

- b) A typographical error exists on Page 3/4 3-37 for TS Table 4.3-2, Engineered Safety Features Actuation System Instrumentation Surveillance Requirements. Specifically, the first sub-letter in Item 4, "Steam Line Isolation Manual Initiation," appears as sub-letter "d." The correct lettering should be sub-letter "a". Therefore, sub-letter "d" needs to be replaced with sub-letter "a."

This proposed change is editorial in nature and does not involve any physical changes to SSCs in the plant, or the way SSCs are operated or controlled.

- c) DNC proposes to revise TS 6.3.2, Facility Staff Qualifications, from:

"If the operations manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the operations manager shall have held a senior reactor operator license at a pressurized water reactor, and the assistant operations manager shall hold a senior reactor operator license for Millstone Unit No. 3."

to:

"The operations manager or at least one operations middle manager shall hold a senior reactor operator license for Millstone Unit No. 3."

The format of TS 6.3.2 is being revised to more closely match the format used in NUREG-1431, Rev. 4, TS 5.2.2d, for Westinghouse standard TS plants.

The proposed change also replaces the position of "assistant operations manager" with "at least one operations middle manager" and would require that either the operations manager or at least one operations middle manager (e.g., an assistant operations manager or the supervisor in charge of the operations shift crews) have a senior reactor operator (SRO) license for MPS3. As discussed in the regulatory analysis section of this LAR (Section 4.1.2), the proposed change to TS 6.3.2 is administrative in nature and has no technical implications on TS requirements. With the proposed change, operation, maintenance and testing will continue to assure safe operation of MPS3 and to protect the health and safety of the public.

The TSs will continue to provide administrative controls relating to the organization and management of MPS3 and to ensure compliance with regulations.

- d) The term "SORC" which appears in paragraph b of the "Licensee initiated changes to the REMODCM," described in TS 6.13 is no longer used at MPS. This acronym, which stood for Site Operations Review Committee, has been replaced with FSRC or Facility Safety Review Committee. Consequently, the term "SORC" needs to be replaced with "FSRC."

This proposed change is administrative in nature and does not involve any physical changes to SSCs in the plant, or the way SSCs are operated or controlled.

## **4.0 REGULATORY ANALYSIS**

### **4.1 Applicable Regulatory Requirements/Criteria**

- 4.1.1 The NRC's regulatory requirements related to the content of the TSs are set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical specifications." This regulation requires that the TSs include items in the following five specific categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

The TS index, which this LAR proposes to remove from the TSs, is not a required component of the TSs in 10 CFR 50.36. Similar to the TS Bases, the index provides information about the TSs but is not part of the TSs. Because the index does not provide technical information required by 10 CFR 50.36, the proposed administrative change to remove the index from the TSs is consistent with regulatory requirements.

- 4.1.2 TS 6.3.1 currently requires that each member of the facility staff shall meet or exceed the minimum qualifications of American National Standards Institute (ANSI) N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," for comparable positions (note that as of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000). ANSI N18.1-1971 specifies that the operations manager hold an SRO license for the unit. In 1987, this guidance was revised in ANSI/ANS-3.1-1987 such that if the operations manager does not hold an SRO license, then the operations middle manager shall hold an SRO license.

The existing language used in TS 6.3.2, Facility Staff Qualifications, allows the assistant operations manager (functionally equivalent to the operations middle manager referenced in ANSI/ANS-3.1-1987), if one is designated, to hold an SRO

license if the operations manager does not hold an SRO license for the unit. This allowance was approved for MPS3 under License Amendment (LA) 132 (Reference 6.4). As stated in the NRC safety evaluation report for LA 132, the staff concluded that:

*"The specification that either the Operations Manager or the Assistant Operations Manager hold a Millstone Unit 3 SRO license is consistent with the requirements of 10 CFR 50.54(l) and ensures that a licensed off-shift senior operator is directing the licensed activities of the licensed operators provided that the crews report directly to and receive overall day-to-day guidance on plant operations from the individual holding the current Senior Reactor Operator license. Requiring an ANSI/ANS-3.1-1987 qualification and licensed Assistant Operations Manager when the Operations Manager does not hold a valid Millstone Unit 3 SRO license is consistent with the requirements of ANSI N18.1-1971 and ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position."*

The proposed administrative change to TS 6.3.2 is consistent with the requirements of ANSI N18.1-1971. DNC proposes to revise TS 6.3.2 such that the operations manager or at least one operations middle manager (e.g., an assistant operations manager or the supervisor in charge of the operations shift crews) shall hold an SRO license for MPS3. Modifying the title in TS 6.3.2 to allow at least one operations middle manager (i.e., any position between the operations manager and the shift managers) to hold the SRO license on the unit meets the intent of ANSI N18.1-1971. This change will allow the operations manager and other operations middle managers to perform higher level duties such as management, planning, and coordinating of operations activities with more general senior operator knowledge.

This proposed change continues to be consistent with the requirements of 10 CFR 50.54(l) to ensure that a licensed off-shift senior operator is directing the licensed activities of the licensed operators and with the standards set forth in ANSI N18.1-1971 to ensure there is relevant operational experience and knowledge in senior operations management position(s).

Additionally, the format of TS 6.3.2 is being revised to more closely match the format used in NUREG-1431, Rev. 4, TS 5.2.2d, for Westinghouse standard TS plants.

## **4.2 No Significant Hazards Consideration**

The NRC has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92(c). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment would not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety.

DNC has evaluated whether or not a significant hazards consideration is involved with the proposed changes. A discussion of these standards as they relate to this change request is provided below.

**1) Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No. The proposed changes are administrative in nature. The proposed changes remove the TS Index and make other editorial and administrative corrections to the TSs. These administrative changes are not initiators of any accident previously evaluated, and, consequently, the probability and consequences of an accident previously evaluated is not significantly increased. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2) Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No. The proposed changes are administrative in nature so no new or different accidents result from the proposed changes. The changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The changes do not alter assumptions made in the safety analysis. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

**3) Do the proposed changes involve a significant reduction in the margin of safety?**

Response: No. The proposed administrative changes do not involve a change in the method of plant operation, do not affect any accident analyses, and do not relax any safety system settings. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, DNC concludes that the proposed changes do not present a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

#### **4.3 Conclusion**

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.



## **5.0 ENVIRONMENTAL CONSIDERATION**

DNC has determined that the proposed amendment would not change a requirement with respect to installation or use of a facility component located within the restricted area, as defined by 10 CFR 20, or an inspection or surveillance requirement. The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need to be prepared in connection with the proposed amendment.

## **6.0 REFERENCES**

- 6.1 NRC Letter "Seabrook Station, Unit No. 1 – Issuance of Amendment Regarding the Administrative Changes and Corrections to the Technical Specifications (TAC No. MF1033)," June 17, 2013 (ADAMS Accession No. ML13074A760).
- 6.2 NRC Letter "Waterford Steam Electric Station, Unit 3 - Issuance of Amendment Re: Modification of Technical Specification (TS) 5.3.1, Fuel Assemblies, T.S. 5.6.1, Criticality, T.S. 6.9.1.11.1, Core Operating Limits Reports, and Deletion of TS Index (TAC No. MC3584)," May 9, 2005 (ADAMS Accession No. ML051290368).
- 6.3 NRC Letter "Arkansas Nuclear One, Unit 2 - Issuance of Amendments Re: Deletion of Index Pages from the Technical Specifications (TAC No. MC3246)," June 22, 2005 (ADAMS Accession No. ML051740191).
- 6.4 NRC Letter "Issuance of Amendment (TAC No. M93730)," January 7, 1997.

**ATTACHMENT 2**

**MARKED-UP TECHNICAL SPECIFICATION PAGES**

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

October 27, 2008

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January 29, 2001

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**SURVEILLANCE REQUIREMENTS**

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	ANALOG CHANNEL OPERATIONAL TEST	TRIP ACTUATING DEVICE OPERATIONAL TEST	ACTUATION LOGIC TEST	RELAY TEST	MASTER RELAY TEST	SLAVE RELAY TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
3. Containment Isolation									
a. Phase "A" Isolation									
1. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
2. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q (4)	Q (4)	1, 2, 3, 4
3. Safety Injection	See Item 1. above for all Safety Injection Surveillance Requirements.								
b. Phase "B" Isolation									
1. Manual Initiation	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
2. Automatic Actuation Logic and Actuation Relays	N.A.	N.A.	N.A.	N.A.	M(1)	M(1)	Q (4)	Q (4)	1, 2, 3, 4
3. Containment Pressure-High-3	S	R	Q	N.A.	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
c. DELETED									
4. Steam Line Isolation									
d. Manual Initiation									
1. Individual	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4
2. System	N.A.	N.A.	N.A.	R	N.A.	N.A.	N.A.	N.A.	1, 2, 3, 4

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6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971\* for comparable positions. Exceptions to this requirement are specified in the Quality Assurance Program. +

6.3.2 ~~If the operations manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the operations manager shall have held a senior reactor operator license at a pressurized water reactor, and the assistant operations manager shall hold a senior reactor operator license for Millstone Unit No. 3.~~

The operations manager or at least one operations middle manager shall hold a senior reactor operator license for Millstone Unit No. 3. +

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements as specified in the Quality Assurance Program and 10 CFR Part 55.59 shall be maintained. +

6.4.2 Deleted.

6.5 DELETED.

\* As of November 1, 2001, applicants for reactor operator and senior reactor operator qualification shall meet or exceed the education and experience guidelines of Regulatory Guide 1.8, Revision 3, May 2000.

November 28, 2000

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6.13 RADIOLOGICAL EFFLUENT MONITORING AND OFFSITE DOSE CALCULATION  
MANUAL (REMODCM)

- a. The REMODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental program; and
- b. The REMODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release, reports required by Specification 6.9.1.3 and Specification 6.9.1.4.

Licensee initiated changes to the REMODCM:

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
  - 1) sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
  - 2) a determination that the change(s) will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after review and acceptance by ~~SORC~~ and the approval of the designated officer; and 

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- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire REMODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the REMODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

6.14 RADIOACTIVE WASTE TREATMENT

Procedures for liquid and gaseous radioactive effluent discharges from the Unit shall be prepared, approved, maintained and adhered to for all operations involving offsite releases of radioactive effluents. These procedures shall specify the use of appropriate waste treatment systems utilizing the guidance provided in the REMODCM.

The Solid Radioactive Waste Treatment System shall be operated in accordance with the Process Control Program to process wet radioactive wastes to meet shipping and burial ground requirements.