

Dominion Nuclear Connecticut, Inc.
5000 Dominion Boulevard, Glen Allen, VA 23060

Web Address: www.dom.com



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March 28, 2014

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

Serial No 14-035
NSSL/MLC R0
Docket No. 50-245
License No. DPR-21

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 1
LICENSE AMENDMENT REQUEST FOR ADMINISTRATIVE CHANGES TO THE
PERMANENTLY DEFUELED TECHNICAL SPECIFICATIONS

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 1 (MPS1) Permanently Defueled Technical Specifications (PDTSSs). The proposed LAR deletes the Table of Contents section and makes administrative changes to the PDTSSs.

Attachment 1 to this letter provides a description and evaluation of the proposed changes. Attachment 2 contains the marked-up PDTSS pages 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.

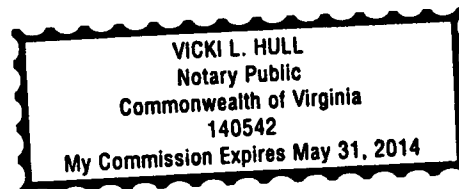
Should you have any questions in regard to this submittal, please contact Wanda Craft at (804) 273-4687.

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 28TH day of March, 2014.

My Commission Expires: MAY 31, 2014

Notary Public

A001
NRR

Attachments:

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

Commitments made in this letter: None

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

M. C. Thadani
Project Manager - Millstone Power Station
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop O8 B 1
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 1

EVALUATION OF PROPOSED LICENSE AMENDMENT

**DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 1**

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 1 (MPS1) Permanently Defueled Technical Specifications (PDTSSs). The proposed LAR deletes the Table of Contents section and makes administrative changes to the PDTSSs.

2.0 PROPOSED CHANGES

DNC proposes to make the following changes to the MPS1 PDTSSs:

- a) Delete the Table of Contents section from the PDTSSs.
- b) Replace the position title of "assistant operations manager" in PDTSS 5.3.2, Facility Staff Qualifications, with "at least one operations middle manager."
- c) Replace the term "SORC" on pages 5.0-7, 5.0-8, and 5.0-9 with the term "FSRC."

Mark-ups of the affected PDTSS 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 Table of Contents section from the MPS1 PDTSSs. Past LAR submittals to the NRC have included the Table of Contents section to support requested PDTSS changes, and a revised Table of Contents has been included in issued amendments. This change will eliminate the need to include Table of Contents pages as part of LAR submittals for future PDTSS changes and to issue revised Table of Contents pages with an amendment. Although the Table of Contents would no longer be considered part of the MPS1 PDTSSs, controlled copy holders would continue to receive updates to the Table of Contents for future PDTSS and PDTSS Bases changes.

The Table of Contents identifies the contents of the PDTSSs and where the specific sections can be found 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 Station, Unit No. 1 in June 2013 (Reference 6.1), Waterford Unit 3 in May 2005 (Reference 6.2), and for Arkansas Nuclear One, Unit 2 in June 2005 (Reference 6.3).

- b) DNC proposes to revise PDTs 5.3.2, Facility Staff Qualifications, from:

"The operations manager or assistant operations manager shall be a CERTIFIED FUEL HANDLER."

to:

"The operations manager or at least one operations middle manager shall be a CERTIFIED FUEL HANDLER."

The proposed change replaces the position title 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) be a certified fuel handler. As discussed in the Regulatory Analysis section of this LAR (Section 4.1.2), the proposed change to PDTs 5.3.2 is administrative in nature and has no technical implications on TS requirements. The PDTs will continue to provide administrative controls relating to the organization and management of MPS1 and to ensure compliance with regulations.

- c) The term "SORC" which appears throughout the Administrative Controls section of the PDTs, 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" will 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 Table of Contents section which this LAR proposes to remove is not a required component of the PDTs in 10 CFR 50.36. Similar to the PDTs Bases, the Table of Contents provides information about the PDTs but is not part of the PDTs. Because the Table of Contents section does not provide technical information required by 10 CFR 50.36, the proposed administrative change to remove the Table of Contents section from the PDTs is consistent with regulatory requirements.

- 4.1.2 PDTs 5.3.1 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. This standard specifies that the operations manager hold an SRO license for the unit.

By letter dated July 21, 1998, Northeast Nuclear Energy Company (NNECO) certified to the NRC, under the provisions of 10 CFR 50.82(a), that MPS1 had permanently ceased operations and that the fuel had been permanently removed from the reactor vessel. Because licensed and senior licensed operators (SROs) were no longer required for a plant in a permanently defueled condition, the staff qualifications were modified (Reference 6.4) to require the operations manager or assistant operations manager to be a certified fuel handler. This change ensures that the certified fuel handlers report to a management individual with at least an equivalent level of qualification.

DNC proposes to revise PDTs 5.3.2 such that the operations manager or at least one operations middle manager shall be a certified fuel handler. Modifying the title in PDTs 5.3.2 to allow at least one operations middle manager (e.g., an assistant operations manager or the supervisor in charge of the operations shift crews) to be a certified fuel handler 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.

The proposed change will continue to meet the training and qualification requirements of 10 CFR 50.120 and the standards set forth in ANSI N18.1-1971 to ensure there is relevant operational experience and knowledge in senior operations management position(s).

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 PDTs Table of Contents section and make two other administrative changes to the PDTs.

Furthermore, MPS1 has permanently ceased operation and is being maintained in a defueled condition. Therefore, the only credible design basis accident is a fuel handling accident. The administrative changes proposed herein are not initiators of any fuel handling accident previously evaluated, and, consequently, the probability and consequences of a fuel handling accident previously evaluated is not significantly increased.

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 No. 104 to Facility Operating License No. DPR-21, Millstone Nuclear Power Station, Unit 1(TAC No. MA4373), March 5, 1999.

ATTACHMENT 2

**MARKED-UP PERMANENTLY DEFUELED TECHNICAL SPECIFICATION
PAGES**

**DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 1**

March 11, 2004

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 Definitions.....	1-1
1.1 OBJECTIVE.....	1-1
1.2 DEFINITIONS.....	1-1
1.2.1 Instrument or Channel Calibration.....	1-1
1.2.2 Instrument or Channel Functional Test.....	1-2
1.2.3 Instrument Check.....	1-2
1.2.4 Staggered Test Basis.....	1-2
2.0 DELETED.....	2-1
3/4.0 Spent Fuel Pool Water Temperature.....	3/4-1
3/4.1 LIMITING CONDITION FOR OPERATION.....	3/4-1
3/4.2 ACTION.....	3/4-1
3/4.3 SURVEILLANCE REQUIREMENT.....	3/4-1
3/4.4 BASES.....	3/4-1
5.0 Inservice Inspection.....	5-1
5.1 OBJECTIVE.....	5-1
5.2 REFERENCES.....	5-1
5.3 LIMITING CONDITION FOR OPERATION.....	5-1
5.4 ACTION.....	5-1
5.5 SURVEILLANCE REQUIREMENT.....	5-2
A Inspections.....	5-2
B Testing.....	5-2
C Special Report.....	5-2
5.6 BASES.....	5-3

March 11, 2004

TABLE OF CONTENTS (Continued)

<u>SECTION</u>	<u>PAGE</u>
6.0 Fire Protection Systems.....	6-1
6.0.1 OBJECTIVE.....	6-1
6.0.2 INDEX OF CONTENTS.....	6-1
6.0.3 BASES.....	6-1
6.0.4 Definitions.....	6-2
6.0.5 Administrative Requirements.....	6-2
6.1 FIRE SUPPRESSION WATER SYSTEM.....	6-3
6.1.1 LIMITING CONDITION FOR OPERATION.....	6-3
6.1.2 APPLICABILITY.....	6-3
6.1.3 ACTION.....	6-3
6.1.4 SURVEILLANCE.....	6-3
6.1.5 BASES.....	6-3
6.2 DELETED.....	6-7
6.3 DELETED.....	6-8
6.4 FIRE HOSE STATIONS.....	6-9
6.4.1 LIMITING CONDITION FOR OPERATION.....	6-9
6.4.2 APPLICABILITY.....	6-9
6.4.3 ACTION.....	6-9
6.4.4 SURVEILLANCE.....	6-9
6.4.5 BASES.....	6-10

March 11, 2004

TABLE OF CONTENTS (Continued)

<u>SECTION</u>	<u>PAGE</u>
6.5 FIRE DOORS	6-11
6.5.1 LIMITING CONDITION FOR OPERATION	6-11
6.5.2 APPLICABILITY	6-11
6.5.3 ACTION	6-11
6.5.4 SURVEILLANCE	6-11
6.5.5 BASES	6-12
6.6 FIRE DETECTION INSTRUMENTATION	6-13
6.6.1 LIMITING CONDITION FOR OPERATION	6-13
6.6.2 APPLICABILITY	6-13
6.6.3 ACTION	6-13
6.6.4 SURVEILLANCE	6-13
6.6.5 BASES	6-14
6.7 PENETRATION FIRE BARRIERS	6-15
6.7.1 LIMITING CONDITION FOR OPERATION	6-15
6.7.2 APPLICABILITY	6-15
6.7.3 ACTION	6-15
6.7.4 SURVEILLANCE	6-15
6.7.5 BASES	6-16
Table 1 LOCATION OF HOSE STATION	6-17
Table 2 FIRE DOORS	6-18
Table 3 FIRE DETECTION INSTRUMENTS	6-19

March 11, 2004

TABLE OF CONTENTS (Continued)

<u>SECTION</u>	<u>PAGE</u>
7.0 Unit 1 SSCs That Interface With Unit 2 or 3	7-1
7.1 OBJECTIVE	7-1
7.2 DEFINITIONS	7-1
7.3 REFERENCES	7-2
7.4 LIMITING CONDITION FOR OPERATION	7-3
7.5 ACTION	7-3
7.6 SURVEILLANCE	7-3
7.7 BASES	7-3
Table 1 UNIT 1 SSCs THAT SUPPORT UNIT 2 FUNCTION OR LICENSE BASIS	7-5
Table 2 DELETED	7-6
Table 3 UNIT 1 SSCs THAT SUPPORT UNIT 3 FUNCTION OR LICENSE BASIS	7-7

~~September 15, 2005~~
Facility Staff Qualifications
5.3

ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 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.

5.3.2 The operations manager or ~~assistant operations manager~~ shall be a CERTIFIED FUEL HANDLER.

at least one operations middle manager

September 17, 2002
Procedures
5.5

5.0 ADMINISTRATIVE CONTROLS

5.5 Procedures

5.5.1 Written procedures shall be established, implemented, and maintained covering the following activities:

- a. The procedures applicable to the safe storage of irradiated fuel recommended in Appendix "A" of Regulatory Guide 1.33, February 1978;
- b. Fire Protection Program implementation;
- c. Cold Weather Operations;
- d. Quality Controls for effluent monitoring, using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974;
- e. Liquid and gaseous radioactive effluent discharges from the unit for all operations involving offsite releases of radioactive effluents. These procedures shall specify the use of appropriate waste treatment utilizing the guidance provided in the REMODCM;
- f. Fuel handling operations;
- g. All programs specified in Specification 5.6, except for Section I.E., Radiological Environmental Monitoring of REMODCM, which is performed in accordance with Specifications 5.5.6 and 5.5.7.

5.5.2 The designated manager, designated officer, or designated senior officer may designate specific procedures and programs, or classes of procedures and programs to be reviewed in accordance with the Station Qualified Reviewer Program in lieu of review by the ~~SORC~~. The review per the ~~SORC~~ or Station Qualified Reviewer Program shall be in accordance with the Quality Assurance Program Topical Report.

5.5.3 Procedures listed in Specification 5.5.1, and changes thereto, shall be approved by the designated manager, or designated officer or by cognizant managers or directors who are designated as the Approval Authority by the designated manager, or designated officer as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

(continued)

September 17, 2002
Procedures
5.5

5.0 ADMINISTRATIVE CONTROLS

5.5 Procedures (continued)

5.5.4 Each procedure of Specification 5.5.1, and changes thereto, shall be reviewed by the ~~SORC~~ and shall be approved by the designated manager or designated officer, or be reviewed and approved in accordance with the Station Qualified Reviewer Program prior to implementation. Each procedure of Specification 5.5.1 shall be reviewed periodically as set forth in administrative procedures. +

5.5.5 Temporary changes to procedures of Specification 5.5.1 above may be made provided:

- a. the intent of the original procedure is not altered;
- b. the change is approved by two members of the plant management staff, at least one of whom is a CERTIFIED FUEL HANDLER;
- c. the change is documented, reviewed by the ~~SORC~~ or the Station Qualified Reviewer Program, as applicable, and approved by the designated manager, designated officer, or the Station Qualified Reviewer Program department manager within 14 days of implementation.

5.5.6 All procedures and procedure changes required for the Radiological Environmental Monitoring Program (REMP) of Specification 5.6.1 shall be reviewed by an individual (other than the author) from the organization responsible for the REMP and approved by appropriate supervision. +

5.5.7 Temporary changes may be made for the Radiological Environmental Monitoring Program provided the intent of the original procedure is not altered and the change is documented and reviewed by an individual (other than the author) from the organization responsible for the REMP within 14 days of implementation. +

(continued)

~~Nov 9, 1999~~
Programs and Manuals
5.6

5.0 ADMINISTRATIVE CONTROLS

5.6 Programs and Manuals

The following programs shall be established, implemented and maintained.

5.6.1 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 monitoring 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 5.7.2 and Specification 5.7.3.

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 10CFR20.1302, 40CFR Part 190, 10 CFR 50.36a and Appendix I to 10CFR50, 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

↑
FSRC

(continued)