

From: Guzman, Richard
Sent: Friday, June 26, 2015 11:01 AM
To: 'wanda.d.craft@dom.com'
Subject: Millstone Unit 2 - Request for Additional Information re: LAR to Relocate Surveillance Frequencies to Licensee Control IAW TSTF-425, Rev 3 (TAC No. MF5096)

Wanda,

The NRC staff is reviewing the information provided in the subject license amendment request dated October 22, 2014 (ADAMS Accession No. ML14301A112), as supplemented by letter dated June 5, 2015 (ADAMS Accession No. ML15163A021) and has determined that additional information is needed to complete its review. Shown below is the NRC staff's request for additional information (RAI) questions. As initially communicated to you on June 18, 2015, please provide your formal response by July 27, 2015. Please contact me if you have any questions.

REQUEST FOR ADDITIONAL INFORMATION
DOMINION NUCLEAR CONNECTICUT, INC., MILLSTONE POWER STATION UNIT 2
LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATIONS BY
RELOCATING SURVEILLANCE FREQUENCIES
TO A LICENSEE CONTROL PROGRAM IN ACCORDANCE WITH TSTF-425, REVISION 3
TAC NO. MF5096

By letter dated October 22, 2014, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14301A112), Dominion Nuclear Connecticut, Inc., (the Licensee) submitted a License Amendment Request (LAR) for Millstone Power Station Unit 2. Specifically the licensee proposed to adopt U.S. Nuclear Regulatory Commission (NRC) approved Revision 3 to Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) Change traveler TSTF-425, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiatives 5b" which is an approved change to the STSs (ADAMS Accession No. ML090850642). The proposed changes relocate specific surveillance frequencies to a licensee controlled program based on the approved methodology included in Nuclear Energy Institute 04-10, "Risk Informed Technical Specification Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies."

The NRC's regulatory requirements related to the content of the Technical Specifications Surveillance Requirements (SRs) are contained in Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36(c)(3). In its review of the LAR to ensure that the proposed TS change is in accordance with 10 CFR 50.36, the NRC staff uses NUREG-0800, Standard Review Plan, Chapter 16, TSs; NUREG-1433, STS, General Electric BWR/4 Plants, Rev. 4, and the approved TSTF as guidance. According to this guidance, the language in the proposed TS changes must be the same or equivalent to that in the current TS unless there is adequate technical or administrative reasoning supporting the change.

RAI #1

Please provide the technical justification for the addition of the word “required” to SRs in all instances including 4.1.3.3, 4.3.1.1.1, 4.3.2.1.1, 4.3.3.1.1, 4.3.3.5, and 4.3.3.8. The addition of this word appears to be outside the scope of TSTF-425.

RAI #2

On page 2 of 5 of Attachment 1 in the LAR, the licensee states that the word “PROGRAM” will be deleted from the table 4.7-2 title; however, the word also appears in the SR 4.7.1.4 description on page 3/4 7-7. Please submit a TS markup to remove the corresponding word “program” from the SR 4.7.1.4 description or alternatively provide an explanation of why the word should be retained.

RAI #3

In SR 4.8.2.1Ab, the licensee proposes to add “the frequency specified in the Surveillance Frequency Control Program (SFCP),” in place of the “least once per refueling” currently specified. However, this does not appear to be a routine periodic surveillance, in that this frequency appears to be a frequency that is “event-driven with a time component for performing the surveillance on a one-time basis once the event occurs.” Please provide the technical basis for relocating this frequency to the SFCP. Per Section 2.0 of the approved TSTF-425, Revision 3, relocation of “Frequencies that are event-driven but have a time component for performing the surveillance on a one time basis once the event occurs” are specifically prohibited.

RAI #4

On page 4 of 12 of Attachment 4 in the LAR, the licensee indicated that SR 4.1.1.5 would be included with the LAR. The NRC staff has not found page 3/4 1-7 included with the original submittal. Does MPS2 intend to include the SR 4.1.1.5 frequency in the SFCP?

Thanks,

Rich Guzman
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NRR/DORL
US NRC
301-415-1030