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Dominion®

July 20, 2015

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

Serial No. 15-342
NLOS/WDC R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
RESPONSE TO SECOND REQUEST FOR ADDITIONAL INFORMATION
REGARDING RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY
REQUIREMENTS TO A LICENSEE CONTROLLED PROGRAM (TAC NO. MF5096)

By letter dated October 22, 2014, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2). The proposed amendment would relocate certain technical specification (TS) surveillance frequencies to a licensee-controlled program by adopting Technical Specification Task Force (TSTF) -425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed Technical Specification Task Force] Initiative 5b." The proposed change would also add a new program, the Surveillance Frequency Control Program, in accordance with TSTF-425. In an email dated May 6, 2015, the Nuclear Regulatory Commission (NRC) transmitted a request for additional information (RAI) related to the LAR. DNC responded to the RAI in a letter dated June 5, 2015. In an email dated June 26, 2015, the NRC transmitted a second RAI. DNC agreed to respond to the RAI by July 27, 2015.

Attachment 1 provides DNC's response to the second RAI.

If you have any questions regarding this submittal, please contact Wanda Craft at (804) 273-4687.

Sincerely,

Mark D. Sartain
Vice President – Nuclear Engineering

COMMONWEALTH OF VIRGINIA)

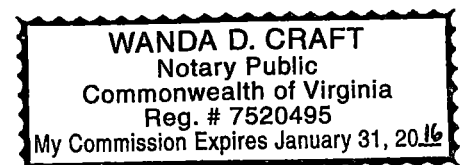
COUNTY OF HENRICO)

The foregoing document was acknowledged before me, in and for the County and State 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 20th day of July, 2015.

My Commission Expires: January 31, 2016

Wanda D. Craft
Notary Public



ACD/
NRR

Attachment:

1. Response to Second Request for Additional Information Regarding Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program
2. Technical Specifications Marked-up Pages

Commitments made in this letter: None

cc: U.S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
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ATTACHMENT 1

**RESPONSE TO SECOND REQUEST FOR ADDITIONAL INFORMATION
REGARDING RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY
REQUIREMENTS TO A LICENSEE CONTROLLED PROGRAM**

**MILLSTONE POWER STATION UNIT 2
DOMINION NUCLEAR CONNECTICUT, INC.**

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RAI 1

Please explain or provide adequate 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.

DNC Response

DNC added the word "required" to Surveillance Requirements (SRs) 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 for clarification purposes only. The limiting conditions for operation (LCOs) associated with each of these SRs specify a minimum number of channels required to be operable in applicable modes of operation. Under certain conditions or modes, the LCOs allow less than the total number of channels to be operable (e.g., 2 out of 4 channels). As currently written, these SRs may be misleading since they imply that all channels are required to be demonstrated operable. Although this clarification is outside the scope of TSTF-425, Revision 3, it is consistent with the license amendment request to adopt TSTF-425 for Millstone Unit 3 which was approved by the NRC under License Amendment 258 (ADAMS Accession No. ML14023A748).

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, but that 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.

DNC Response

DNC agrees that the word "program" in Surveillance Requirement (SR) 4.7.1.4 should be deleted to be consistent with deletion of the word "PROGRAM" from the title descriptor in

Table 4.7.2. The TS markup to reflect this change to SR 4.7.1.4 is provided in Attachment 2.

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.

DNC Response

The frequency specified in SR 4.8.2.1Ab of “at least once per refueling” is a routine periodic surveillance that is performed on an 18-month interval during each refueling outage. Due to the custom format and wording of the MPS2 TSs, the frequency can appear to be event-driven and therefore not a candidate for relocation to the SFCP. However, in this case, the term “refueling” is used to define the interval or frequency.

The wording contained in SR 4.8.2.1Ab is similar to the wording in SRs 4.4.3.1.2 and 4.4.3.2.2 for MPS3. These surveillances, which specified “at least once each refueling interval” were approved for relocation to the SFCP under MPS3 License Amendment 258 (ADAMS Accession No. ML14023A748).

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 change?

DNC Response

Yes. DNC proposes to include SR 4.1.1.5 (i.e., SR 4.1.1.5.b) in the change since it does not meet any of the four exclusion criteria specified in TSTF-425, Revision 3. The TS mark-up to reflect relocation of the surveillance frequency in SR 4.1.1.5.b to the SFCP, is provided in Attachment 2.

ATTACHMENT 2

TECHNICAL SPECIFICATIONS MARKED-UP PAGES

**MILLSTONE POWER STATION UNIT 2
DOMINION NUCLEAR CONNECTICUT, INC.**

~~August 1, 1975~~

PLANT SYSTEMS

ACTIVITY

LIMITING CONDITION FOR OPERATION

3.7.1.4 The specific activity of the secondary coolant system shall be ≤ 0.10 uCi/gram DOSE EQUIVALENT I-131.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With the specific activity of the secondary coolant system > 0.10 uCi/gram DOSE EQUIVALENT I-131, be in COLD SHUTDOWN within 36 hours after detection.

SURVEILLANCE REQUIREMENTS

4.7.1.4 The specific activity of the secondary coolant system shall be determined to be within the limit by performance of the sampling and analysis ~~program~~ of Table 4.7-2.

~~September 25, 2003~~

REACTIVITY CONTROL SYSTEMS

MINIMUM TEMPERATURE FOR CRITICALITY

LIMITING CONDITION FOR OPERATION

3.1.1.5 The Reactor Coolant System temperature (T_{avg}) shall be $\geq 515^{\circ}\text{F}$ when the reactor is critical.

APPLICABILITY: MODES 1 and 2*.

ACTION:

With the Reactor Coolant System temperature (T_{avg}) $< 515^{\circ}\text{F}$, restore T_{avg} to within its limit within 15 minutes or be in HOT STANDBY within the next 15 minutes.

SURVEILLANCE REQUIREMENTS

4.1.1.5 The Reactor Coolant System temperature (T_{avg}) shall be determined to be $\geq 515^{\circ}\text{F}$.

- a. Within 15 minutes prior to making the reactor critical, and
- b. ~~At least once per hour~~ when the reactor is critical and the Reactor Coolant System temperature (T_{avg}) is $< 525^{\circ}\text{F}$.

the frequency specified in the Surveillance Frequency Control Program

* With $K_{eff} \geq 1.0$.