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April 21, 2016

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

Serial No. 16-115  
NLOS/WDC R0  
Docket No. 50-336  
License No. DPR-65

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 2**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING**  
**ASME SECTION XI INSERVICE INSPECTION PROGRAM**  
**RELIEF REQUESTS FOR LIMITED COVERAGE EXAMINATIONS PERFORMED IN**  
**THE FOURTH 10-YEAR INSPECTION INTERVAL (CAC NO. MF6569)**

By letter dated July 30, 2015, Dominion Nuclear Connecticut, Inc. (DNC) submitted relief requests for limited coverage examinations performed in the first inspection period of the fourth 10-year inservice inspection interval for Millstone Power Station Unit 2 (MPS2). In an email dated March 8, 2016, the Nuclear Regulatory Commission transmitted a request for additional information (RAI) to DNC related to Relief Request RR-04-19. DNC agreed to respond to the RAI by April 22, 2016.

The attachment to this letter provides DNC's response to the NRC's RAI. As discussed in a call between DNC and the NRC staff on April 21, 2016, additional information related to the weld filler metal for weld BSI-C-3004 will be provided by May 23, 2016.

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

Sincerely,

Mark D. Sartain  
Vice President – Nuclear Engineering

Commitments made in this letter: None

Attachment:

Response to Request for Additional Information Regarding ASME Section XI Inservice Inspection Program Relief Requests for Limited Coverage Examinations Performed in the Fourth 10-Year Inspection Interval – RR-04-19

AD47  
NRR

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**ATTACHMENT**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING ASME  
SECTION XI INSERVICE INSPECTION PROGRAM RELIEF REQUESTS FOR  
LIMITED COVERAGE EXAMINATIONS PERFORMED IN THE FOURTH 10-YEAR  
INSPECTION INTERVAL**

**RR-04-19**

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

By letter dated July 30, 2015, Dominion Nuclear Connecticut, Inc. (DNC) submitted relief requests for limited coverage examinations performed in the first inspection period of the fourth 10-year inservice inspection interval for Millstone Power Station Unit 2 (MPS2). In an email dated March 8, 2016, the Nuclear Regulatory Commission (NRC) transmitted a request for additional information (RAI) to DNC related to Relief Request RR-04-19. This attachment provides DNC's response to the NRC's RAI.

For all welds:

### **Question 1**

*The piping and components are described as being constructed from "Stainless" or "Carbon" steel, but the alloys are not identified. For each weld, please provide the materials of construction for the pipes, weld metals, and welded components.*

### **DNC Response**

For welds BPY-C-1063-A, BPY-C-1065-A, BPY-C-3070-A and BPY-C-3072-A the following materials apply:

Pipe—SA376 TP316  
Valve—SA182 F316  
Weld filler metal—ER316L

For weld BPY-C-5019-A the following materials apply:

Pipe—SA376 TP316  
Tee—SA403 WP316  
Weld filler metal—ER316

For weld BSI-C-3004 the following materials apply:

Pipe—A376 TP316  
Elbow - A403 WP316  
Weld filler metal - The weld filler metal in welds associated with this system typically consists of a stainless steel material. This weld is a shop-fabricated weld from original plant construction. The construction drawing prepared by DRAVO Corporation identifies the root pass filler metal as W156/W486 and the completion filler metal as W504/W495, which are vendor specific designations. Additional information related to the weld filler metal will be provided by May 23, 2016.

## **Question 2**

*The NRC staff notes that due to recent operating experience regarding thermal fatigue cracking in some plants, the Electric Power Research Institute (EPRI) issued an interim guidance, "EPRI-MRP Interim Guidance for Management of Thermal Fatigue (Accession Number ML15189A100)," that supplemented the existing industry thermal fatigue guidelines (e.g., MRP-146 and MRP-192) to better manage thermal fatigue cracking. Discuss whether DNC will take any compensatory measures to better manage thermal fatigue cracking in the subject welds to ensure structural integrity and leak tightness since essentially 100% coverage was not achieved by the ultrasonic test.*

## **DNC Response**

The subject welds are not within the areas of concern identified in the industry thermal fatigue guidelines MRP-146 and MRP-192. However, in addition to the ultrasonic weld examinations, the subject welds are located within the general inspection area covered by the Boric Acid Corrosion Control Program. Walkdowns required by the Boric Acid Corrosion Control Program are performed at the beginning of each refueling outage. The subject welds are also included in the Class 1 System Leakage Test performed prior to startup following each refueling outage as required by American Society of Mechanical Engineers Section XI. DNC considers the ultrasonic examination coverage attained, the routine inspection of the areas where these welds are located via the Boric Acid Corrosion Control Program, and the Class 1 System Leakage Test provide sufficient assurance of structural integrity and leak tightness and no further compensatory measures are needed.