



June 1, 2016

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

Serial No. 16-224  
NRAWDC R0  
Docket No. 50-336  
License No. DPR-65

**DOMINION NUCLEAR CONNECTICUT, INC.**  
**MILLSTONE POWER STATION UNIT 2**  
**REGULATORY COMMITMENTS FOR PROPOSED TECHNICAL SPECIFICATION**  
**CHANGE FOR SPENT FUEL STORAGE**

By letter dated December 17, 2012, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2). The proposed amendment would revise Technical Specification (TS) 1.39, "Storage Pattern," TS 3/4.9.18, "Spent Fuel Pool – Storage," TS 3/4.9.19, "Spent Fuel Pool – Storage Patterns," TS 5.3.1, "Fuel Assemblies," TS 5.6.1, "Criticality," and TS 5.6.3, "Capacity" with conforming changes to Technical Specifications Bases (TS Bases) 3/4.9.18 and 3/4.9.19. The proposed changes would reflect the results and constraints of a new criticality safety analysis for fuel assembly storage in the MPS2 fuel storage racks.

In a letter dated February 11, 2013, the NRC provided DNC an opportunity to supplement the LAR identified above. The NRC requested DNC justify the continued credit of Boraflex. DNC provided the supplement in a letter dated February 25, 2013. In a letter dated April 26, 2013, the NRC transmitted a request for additional information (RAI) to DNC related to the LAR. DNC responded to the RAI in a letter dated May 28, 2013.

In an email dated June 16, 2014, the NRC transmitted a draft second request for additional information (RAI) to DNC related to the LAR. In an email dated July 20, 2015, the NRC confirmed that the draft questions are considered final. In a letter dated July 21, 2015, DNC responded to the RAI and included revised TS changes which superseded the proposed TS changes provided in the December 17, 2012 LAR.

During review of the LAR, the NRC identified four activities that DNC committed to associated with the LAR. DNC will ensure that the activities listed in the attachment to this letter are performed prior to implementation of the approved LAR.

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NRK

- ## 1. Regulatory Commitments for Proposed Technical Specification Change for Spent Fuel Storage

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**ATTACHMENT**

**REGULATORY COMMITMENTS FOR PROPOSED TECHNICAL  
SPECIFICATION CHANGE FOR SPENT FUEL STORAGE**

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

By letter dated December 17, 2012, Dominion Nuclear Connecticut, Inc. (DNC) submitted a license amendment request (LAR) for Millstone Power Station Unit 2 (MPS2). The proposed amendment would revise Technical Specification (TS) 1.39, "Storage Pattern," TS 3/4.9.18, "Spent Fuel Pool – Storage," TS 3/4.9.19, "Spent Fuel Pool – Storage Patterns," TS 5.3.1, "Fuel Assemblies," TS 5.6.1, "Criticality," and TS 5.6.3, "Capacity" with conforming changes to Technical Specifications Bases (TS Bases) 3/4.9.18 and 3/4.9.19. The proposed changes would reflect the results and constraints of a new criticality safety analysis for fuel assembly storage in the MPS2 fuel storage racks.

During review of the LAR, the NRC identified four activities that DNC committed to associated with the LAR. DNC will ensure that the activities listed below are performed prior to implementation of the approved LAR.

### **Regulatory Commitments**

- 1) DNC will ensure that its fuel handling procedures include the stipulation that the reactivity control devices must be installed prior to placement of the fuel into the Region 3 storage locations.
- 2) DNC will ensure that its core reload procedures include the stipulation that the burnup history, core operating parameters, burnable absorber use, and CEA usage remains bounded by this criticality safety analysis.
- 3) DNC will ensure that its fuel reconstitution procedures include the stipulations (1) the fuel assembly being reconstituted will be neutronically decoupled from the other fuel assemblies in the SFP, (2) only one fuel rod will be removed at a time, (3) the original fuel rod will be returned to its original location, or it will be replaced with a stainless steel rod or a fuel rod with naturally occurring U-235, or if the entire rod cannot be removed or the removed rod cannot be replaced, then an analysis similar to that performed in Attachment 4 of DNC's supplemental letter dated July 21, 2015 (Reference 4) for fuel assembly P-26 may be performed.
- 4) DNC will ensure that its fuel handling procedures and training program are updated to include restrictions on storing fresh fuel in Regions 3 and 4, visual cues to allow error recognition in move sheets, and training to these procedures are completed.