



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 18, 2019

Mr. Daniel G. Stoddard  
Senior Vice President and  
Chief Nuclear Officer  
Dominion Nuclear  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2 – AUDIT PLAN AND SETUP OF  
ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST TO  
ADOPT 10 CFR 50.69, "RISK-INFORMED CATEGORIZATION AND  
TREATMENT OF STRUCTURES, SYSTEMS AND COMPONENTS FOR  
NUCLEAR POWER REACTORS" (EPID L-2019-LLA-0008)

Dear Mr. Stoddard:

By letter dated January 17, 2019, Agencywide Documents Access and Management System Accession No. ML19023A427), Dominion Energy Nuclear Connecticut, Inc. (the licensee) submitted a license amendment request for the Millstone Power Station, Unit No. 2. The licensee proposed to modify the Millstone 2 licensing basis by the addition of a license condition to allow for the implementation of the provisions of Title 10 of the *Code of Federal Regulations* Part 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors."

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) reviews, the licensee's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff and contractors limited read-only access to the basis documents and other reference materials cited in the applications. The staff plans to initially conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit basis documents to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. Documents identified as necessary for analysis of the application will be identified by the NRC staff. The licensee will be formally requested to submit those documents on the NRC docket. Use of the online reference portal is acceptable, as long as the following conditions are met:

- the online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- the online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents; and
- conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the documents listed in the enclosure to this letter. This is the initial list identified by the NRC staff. The staff may request

additional documents during the review, which will be transmitted to you by e-mail. This audit will potentially obviate the need for an onsite audit and potential requests for additional information. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as user name and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that Dominion Energy Nuclear Connecticut, Inc. agrees to the terms and conditions set forth in this letter.

Should you have any questions regarding the audit and online reference portal, please contact me at 301-415-1030 or by e-mail to [Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov).

Sincerely,

**/RA/**

Richard V. Guzman, Senior Project Manager  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-336

cc: Listserv

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DATED JULY 18, 2019

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**ADAMS Accession No.: ML19198A197**

\*by e-mail

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DRA/APLA/BC*
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DATE	07/18/2019	07/18/2019	07/17/2019
OFFICE	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM	
NAME	JDanna	RGuzman	
DATE	07/18/2019	07/18/2019	

**OFFICIAL RECORD COPY**

AUDIT PLAN  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION TO SUPPORT THE REVIEW OF  
LICENSE AMENDMENT REQUEST  
TO ADOPT 10 CFR 50.69, "RISK-INFORMED CATEGORIZATION AND TREATMENT OF  
STRUCTURES, SYSTEMS AND COMPONENTS FOR NUCLEAR POWER REACTORS"  
MILLSTONE POWER STATION, UNIT NO. 2  
DOCKET NO. 50-336

1.0 BACKGROUND

By letter dated January 17, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19023A427), Dominion Energy Nuclear Connecticut, Inc. (the licensee) submitted a license amendment request for the Millstone Power Station, Unit No. 2 (Millstone 2).

The proposed amendment would modify the licensing basis of Millstone 2 to allow for the implementation of the provisions of Title 10 of the *Code of Federal Regulations* (CFR) 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors." As stated in the license amendment request, the provisions of 10 CFR 50.69 allow adjustment of the scope of equipment, subject to special treatment controls (e.g., quality assurance, testing, inspection, condition monitoring, assessment, and evaluation). For equipment determined to be of low safety significance, alternative treatment requirements can be implemented in accordance with this regulation. For equipment determined to be of high safety significance, requirements will not be changed or will be enhanced. This allows improved focus on equipment that has safety significance resulting in improved plant safety.

2.0 REGULATORY AUDIT BASES

The U.S. Nuclear Regulatory Commission (NRC) staff determined an audit to be the most efficient approach toward a timely resolution of questions associated with this license amendment request review since the staff will have an opportunity to minimize the potential for further rounds of requests for additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The staff is requesting online access to an initial set of documentation to be reviewed at the NRC headquarters. Upon completion of this desk audit, the staff is expected to achieve the following.

1. Determine the need for additional documentation.
2. Develop a request for additional information as needed.
3. Decide if a site audit is required to verify information.

Any RAIs will be issued soon after the audit with an expected response being delivered by the licensee by an agreed upon date. The information discussed in the audit to be included in the

Enclosure

development of the technical NRC staff's safety evaluation will be requested to be submitted on the docket.

### 3.0 REGULATORY AUDIT SCOPE OR METHODOLOGY

The desk audit is being conducted to get a better understanding of the submittals and the availability of the information to make an assessment of the NRC staff's review approach. The area of focus for the regulatory audit is the information that will be requested by the NRC. The staff will review the documentation and generate any RAIs necessary to complete the review. The staff's review will also lead to the decision as to whether a site audit is necessary.

### 4.0 INFORMATION NECESSARY FOR THE REGULATORY AUDIT

The information requested by the NRC staff for the initial desk audit by online reference portal:

- uncertainty notebooks for Millstone 2 internal events and flooding probabilistic risk assessment;
- probabilistic risk assessment calculations evaluating generic and plant-specific uncertainty with respect to the Millstone 2 license amendment request dated January 17, 2019;
- all peer review reports, including the Facts & Observations closure review report; and
- any other supporting documentation that the licensee may determine is responsive to the staff's above information requests.

The licensee will be informed by electronic mail if there is a need for additional supporting documentation.

### 5.0 TEAM ASSIGNMENTS

Key licensee personnel involved in the development of the RAI responses should be made available on a mutually agreeable schedule to respond to any questions from the NRC staff.

#### NRC Staff Team

Michael Levine, NRR/DRA/APLA Technical Reviewer  
Steve Dinsmore, NRR/DRA/APLA Technical Reviewer  
Richard Guzman, NRR/DORL/LPL1 Project Manager

### 6.0 LOGISTICS

The audit will be started once an electronic portal is set up and the documentation is made available to the NRC staff. The desk audit will be conducted over a few weeks, consistent with the internal review schedule for the issuance of the RAIs. The licensee will be kept informed on a regular basis during biweekly discussions with the project manager regarding the progress.

## 7.0 DELIVERABLES

The NRC team will develop an audit summary report to convey the results. The report will be placed in ADAMS within 30 working days of the completion of the final audit session. The NRC will also finalize the RAIs after completion of the audit and issue them to the licensee.