

**From:** [Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com)  
**To:** [Guzman, Richard](#)  
**Subject:** [External\_Sender] RE: Proposed License Conditions for MPS2 50.69  
**Date:** Tuesday, December 17, 2019 4:31:38 PM

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Rich,

We did not have any issues or question on the newly added second paragraph. However, we did note one discrepancy between the first paragraph text below and what we submitted in the LAR:

The licensee is approved to implement 10 CFR 50.69 using the processes for categorization of RISC-1, RISC-2, RISC-3, and RISC-4 structures, systems, and components (SSCs) using: Probabilistic Risk Assessment (PRA) model to evaluate risk associated with internal events, including internal flooding; and the Appendix R program to evaluate fire risk; **and the shutdown safety assessment process to assess shutdown to evaluate fire risk;** and the shutdown safety assessment process to assess shutdown risk; the Arkansas Nuclear One, Unit 2 (ANO-2) passive categorization method to assess passive component risk for Class 2 and Class 3 SSCs and their associated supports; and the results of non-PRA evaluations that are based on the IPEEE Screening Assessment for External Hazards, i.e., seismic margin analysis (SMA) to evaluate seismic risk, and a screening of other external hazards updated using the external hazard screening significance process identified in ASME/ANS PRA Standard RA-Sa-2009; as specified in Unit 2 License Amendment No. 337 dated **[DATE]**.

The text highlighted in blue may be in error, it appears to be a combination of the two clauses before and after it. Deleting this text would make it consistent with our submittal.

Please let me know if you have any questions.

Thanks,  
Shayan

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**From:** Guzman, Richard <Richard.Guzman@nrc.gov>  
**Sent:** Thursday, December 12, 2019 1:28 PM  
**To:** Shayan Sinha (Generation - 6) <Shayan.Sinha@dominionenergy.com>  
**Subject:** [External] Proposed License Conditions for MPS2 50.69

Shayan,

As we discussed, based on the DENC LAR dated January 17, 2019, and our subsequent e-mail exchanges regarding the implementation of the 10 CFR 50.69 proposed license amendment, the NRC staff intends to add the following new license condition to the

Millstone Power Station, Unit No. 2 Operating License. Please confirm that DENC does not have any issues or questions with the proposed wording.

(15) Adoption of 10 CFR 50.69, "Risk-informed categorization and treatment of structures, systems, and components for nuclear power plants"

The licensee is approved to implement 10 CFR 50.69 using the processes for categorization of RISC-1, RISC-2, RISC-3, and RISC-4 structures, systems, and components (SSCs) using: Probabilistic Risk Assessment (PRA) model to evaluate risk associated with internal events, including internal flooding; and the Appendix R program to evaluate fire risk; and the shutdown safety assessment process to assess shutdown to evaluate fire risk; and the shutdown safety assessment process to assess shutdown risk; the Arkansas Nuclear One, Unit 2 (ANO-2) passive categorization method to assess passive component risk for Class 2 and Class 3 SSCs and their associated supports; and the results of non-PRA evaluations that are based on the IPEEE Screening Assessment for External Hazards, i.e., seismic margin analysis (SMA) to evaluate seismic risk, and a screening of other external hazards updated using the external hazard screening significance process identified in ASME/ANS PRA Standard RA-Sa-2009; as specified in Unit 2 License Amendment No. 337 dated [DATE].

DENC will review the completed 10 CFR 50.54(f) reevaluation of external floods and update its 10 CFR 50.69 categorization procedures, as necessary, prior to the adoption of 10 CFR 50.69 to ensure that the potential for external flooding will be incorporated into the categorization process consistent with applicable guidance.

Prior NRC approval, under 10 CFR 50.90, is required for a change to the categorization process specified above (e.g., change from a seismic margins approach to a seismic probabilistic risk assessment approach).

Thanks,

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**Rich Guzman**

Sr. PM, Division Operator Reactor Licensing

Office of Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission

Office: O-9C7 | Phone: (301) 415-1030

[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)

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**From:** [Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com) <[Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com)>

**Sent:** Wednesday, November 20, 2019 10:32 AM

**To:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>

**Subject:** [External\_Sender] RE: Implementation item for MPS2 50.69

Rich,

Our group has reviewed the updated license condition below and we did not identify any conflicts. The wording is consistent with our planned approach.

Thanks,  
Shayan

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**From:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>

**Sent:** Monday, November 18, 2019 2:19 PM

**To:** Shayan Sinha (Generation - 6) <[Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com)>

**Subject:** [External] RE: Implementation item for MPS2 50.69

Shayan,

See updated license condition – changes in red font (i.e., removed specific reference to NEI-00-04).

DENC will review the completed 10 CFR 50.54(f) reevaluation of external floods and update its 10 CFR 50.69 categorization procedures, as necessary, prior to the adoption of 10 CFR 50.69 to ensure that the potential for external flooding will be incorporated into the categorization **process consistent with applicable guidance. consistent with the guidelines for external events evaluation described in NEI 00-04.**

Please let me know if there are any conflicts on your end with the proposed implementation of this license condition.

Thanks,  
Rich

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**From:** [Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com) <[Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com)>

**Sent:** Thursday, November 14, 2019 3:48 PM

**To:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>

**Subject:** [External\_Sender] RE: RE: Implementation item for MPS2 50.69

Rich,

Monday at 1:30 pm would work for us.

Thanks,  
Shayan

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**From:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>  
**Sent:** Thursday, November 14, 2019 3:09 PM  
**To:** Shayan Sinha (Generation - 6) <[Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com)>  
**Subject:** [External] RE: RE: Implementation item for MPS2 50.69

Shayan – on 2<sup>nd</sup> thought, Monday at 1:30pm works better for me. Can you check availability for that time instead?

Thanks,  
Rich

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**From:** [Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com) <[Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com)>  
**Sent:** Thursday, November 14, 2019 1:28 PM  
**To:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>  
**Subject:** [External\_Sender] RE: Implementation item for MPS2 50.69

Rich,  
Just wanted to let you know that I received this. I will reach out to the team working on the MPS2 50.69 LAR and let you know if we have any questions or need a clarification call.

Thanks,  
Shayan

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**From:** Guzman, Richard <[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)>  
**Sent:** Thursday, November 14, 2019 1:16 PM  
**To:** Shayan Sinha (Generation - 6) <[Shayan.Sinha@dominionenergy.com](mailto:Shayan.Sinha@dominionenergy.com)>  
**Subject:** [External] Implementation item for MPS2 50.69

Shayan,

I just left you a voice message. Below is proposed wording for the implementation action associated with the subject amendment regarding the flooding reevaluation:

DENC will review the completed 10 CFR 50.54(f) reevaluation of external floods and update its 10 CFR 50.69 categorization procedures, as necessary, prior to the adoption of 10 CFR 50.69 to ensure that the potential for external flooding will be incorporated into the categorization consistent with the guidelines for external events evaluation described in NEI 00-04.

Please let me know if there any questions/concerns with the proposed implementation item

above. We are available this week or next to have a clarification call, as needed.

Thanks,  
Rich

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**Rich Guzman**

Sr. PM, Division Operator Reactor Licensing

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[Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov)