



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

July 3, 2014

Mr. David A. Heacock
President and Chief Nuclear Officer
Dominion Nuclear Connecticut, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060

SUBJECT: MILLSTONE POWER STATION, UNIT 3 – RELAXATION OF SCHEDULE REQUIREMENTS FOR ORDER EA-12-049 “ISSUANCE OF ORDER TO MODIFY LICENSES WITH REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND DESIGN BASIS EXTERNAL EVENTS”

Dear Mr. Heacock:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A735), the U.S. Nuclear Regulatory Commission (NRC) ordered Dominion Nuclear Connecticut, Inc. (DNC or the licensee) to take certain actions at Millstone Power Station Unit 3 (MPS3) associated with the Fukushima Near-Term Task Force Recommendations. Order EA-12-049 directed that actions be taken by licensees to develop and implement strategies to maintain or restore core cooling, reactor coolant system inventory, containment cooling, and spent fuel pool (SFP) cooling capabilities during beyond design basis external events (BDBEE).

Section IV of the order states that licensees proposing to deviate from requirements contained in NRC Order EA-12-049 may request that the Director, Office of Nuclear Reactor Regulation, relax or rescind certain conditions. By letter dated May 16, 2014 (ADAMS Accession No. ML14140A182), the licensee informed the NRC of its request for a schedule relaxation of the full implementation schedule requirements for MPS3, as prescribed in Section IV.A.2 of NRC Order EA-12-049. DNC has requested an extension of approximately 6 months for full implementation, which moves the MPS3 implementation date from the completion of the fall 2014 outage to April 30, 2015.

DNC's letter dated May 16, 2014, provided the following basis for the granting of scheduler relief. MPS3 has training schedule challenges in 2014, some of which involve several non-routine operator training evaluations. These non-routine operator training evaluations include the bi-annual Crew Performance Evaluation, which inputs to the World Association of Nuclear Operators evaluation and the accreditation renewal of the Millstone Operations Training Program; the quadrennial Institute of Nuclear Power Operations Accreditation Team Visit; and the Hostile Action Based Drill. Additionally, with both MPS Unit 2 and Unit 3 having scheduled refueling outages in the spring and fall of 2014 respectively, the licensee stated that the above non-routine required training is competing for time and resources for mandatory training related to the Licensed Operator Continuing Training Program, the training required for both outages, and the fact that training is not conducted during outages. The licensee states that while all modifications, equipment purchases, procedure development, and storage installation will be


complete by the end of the MPS3 fall 2014 outage, the above non-routine and routine operator training scheduling challenges would not allow training on finalized FLEX Support Guidelines (FSGs) by the end of the MPS3 fall 2014 outage. The licensee anticipates that two training cycles of 6 weeks each will be required following the fall 2014 outage to train all five crews for the finalized FSGs for the order. Based on the timeline to complete the above, DNC is requesting a schedule relaxation of approximately 6 months to April 30, 2015, for full implementation of the mitigation strategies for MPS3. The requested extension would provide the additional time to provide focused FSG training over two training cycles for the MPS3 operating crews.

In light of the facts presented in DNC's May 16, 2014, letter, the NRC staff has determined that the licensee has presented good cause for a relaxation of the order implementation date. The extension would provide additional time to provide MPS3 operating crews training on the FSGs. This training of operating crews is essential to the licensee's capability to cope with a BDBEE. By development and implementation of the MPS3 mitigation strategies, with the exception of full operator training, by completion of the fall 2014 outage, a significant portion of the desired increase in capability to respond to a BDBEE will be realized within the timeframe specified in order EA-12-049. The NRC staff also considered that, following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States, based on the current regulatory requirements and existing plant capabilities. Therefore, the extension of time of approximately 6 months to April 30, 2015, for MPS3 to achieve full implementation of the requirements of the mitigation strategies order is justified and completion before December 2016 is consistent with the intent of the order. These circumstances lead the NRC staff to approve the relaxation of the order implementation date.

Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirement for full order implementation is relaxed for MPS3 until April 30, 2015.

If you have any questions, please contact James Polickoski, Mitigating Strategies Project Manager, at 301-415-5430, or at james.polickoski@nrc.gov.

Sincerely,



Daniel H. Dorman, Acting Director
Office of Nuclear Reactor Regulation

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complete by the end of the MPS3 fall 2014 outage, the above non-routine and routine operator training scheduling challenges would not allow training on finalized FLEX Support Guidelines (FSGs) by the end of the MPS3 fall 2014 outage. The licensee anticipates that two training cycles of 6 weeks each will be required following the fall 2014 outage to train all five crews for the finalized FSGs for the order. Based on the timeline to complete the above, DNC is requesting a schedule relaxation of approximately 6 months to April 30, 2015, for full implementation of the mitigation strategies for MPS3. The requested extension would provide the additional time to provide focused FSG training over two training cycles for the MPS3 operating crews.

In light of the facts presented in DNC's May 16, 2014, letter, the NRC staff has determined that the licensee has presented good cause for a relaxation of the order implementation date. The extension would provide additional time to provide MPS3 operating crews training on the FSGs. This training of operating crews is essential to the licensee's capability to cope with a BDBEE. By development and implementation of the MPS3 mitigation strategies, with the exception of full operator training, by completion of the fall 2014 outage, a significant portion of the desired increase in capability to respond to a BDBEE will be realized within the timeframe specified in order EA-12-049. The NRC staff also considered that, following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States, based on the current regulatory requirements and existing plant capabilities. Therefore, the extension of time of approximately 6 months to April 30, 2015, for MPS3 to achieve full implementation of the requirements of the mitigation strategies order is justified and completion before December 2016 is consistent with the intent of the order. These circumstances lead the NRC staff to approve the relaxation of the order implementation date.

Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirement for full order implementation is relaxed for MPS3 until April 30, 2015.

If you have any questions, please contact James Polickoski, Mitigating Strategies Project Manager, at 301-415-5430, or at james.polickoski@nrc.gov.

Sincerely,
/RA/
 Daniel H. Dorman, Acting Director
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