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August 24, 2015

10 CFR 2.202 EA-12-051

Attention: Document Control Desk U.S. Nuclear Regulatory Commission Washington, D.C. 20555-0001

Serial No.: NL&OS/DEA: R0

14-390C

Docket No.: License No.: DPR-65

50-336

DOMINION NUCLEAR CONNECTICUT, INC. **MILLSTONE POWER STATION UNIT 2** SIX-MONTH STATUS REPORT IN RESPONSE TO MARCH 12, 2012 COMMISSION ORDER MODIFYING LICENSES WITH REGARD TO RELIABLE SPENT FUEL POOL **INSTRUMENTATION (ORDER NUMBER EA-12-051)**

References:

- 1. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012
- 2. Dominion Nuclear Connecticut, Inc. Letter, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013 (Serial No. 12-165B)
- 3. Dominion Nuclear Connecticut, Inc. Letter, Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated March 2, 2015 (Serial No. 14-390B)

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an Order (Reference 1) to Dominion Nuclear Connecticut, Inc. (DNC). Reference 1 was immediately effective and directed DNC to install reliable Spent Fuel Pool level instrumentation (SFPLI).

Reference 1 required submission of an Overall Integrated Plan (OIP) (Reference 2) pursuant to Section IV, Condition C. Reference 1 also required submission of a status report at six-month intervals following submittal of the OIP.

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The attachment to this letter provides the fifth Six-Month Status Report and an update of milestone accomplishments since the submittal of the previous six-month status report (Reference 3), including any changes to the compliance method, schedule, or need for relief and the basis.

If you have any questions, please contact Ms. Diane E. Aitken at (804) 273-2694.

Sincerely,

Mark D. Sartain

Vice President - Nuclear Engineering

Attachment: Six-Month Status Report for the Implementation of Order EA-12-051

Commitments made by this letter: No new regulatory commitments

COMMONWEALTH OF VIRGINIA

COUNTY OF HENRICO

The foregoing document was acknowledged before me, in and for the County and Commonwealth aforesaid, today by Mark D. Sartain who is Vice President Nuclear Engineering of Dominion Nuclear Connecticut, Inc. He has affirmed before me that he is duly authorized to execute and file the foregoing document in behalf of the Company, and that the statements in the document are true to the best of his knowledge and belief.

Acknowledged before me this 24 day of <u>Jugust</u>

My Commission Expires: //

(SEAL)

Vicki L. Hull NOTARY PUBLIC Reg. # 140542

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NRC Senior Resident Inspector Millstone Power Station

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Attachment

Six-Month Status Report for the Implementation of Order EA-12-051 Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation

August 2015

Dominion Nuclear Connecticut, Inc. (DNC)
Millstone Power Station Unit 2

Six-Month Status Report for the Implementation of Order EA-12-051

1 Introduction

Dominion Nuclear Connecticut, Inc. (DNC) developed an Overall Integrated Plan (OIP) (Reference 1) documenting the requirements to install reliable Spent Fuel Pool (SFP) Level Instrumentation (SFPLI) in response to Order EA-12-051 (the Order) (Reference 2). This attachment provides an update of milestone accomplishments since submittal of the last status report for Millstone Power Station Unit 2 (MPS2) (Reference 3), including changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestones have been completed since the development of the MPS2 OIP for Order EA-12-051 and are current as of July 31, 2015.

- 1. Submit Overall Integrated Plan
- 2. Commence Engineering and Design
- 3. Complete Engineering and Design
- 4. Complete Procurement of SFP Instruments
- 5. Commence Installation of SFP Instruments

3 Milestone Schedule Status

The following provides an update to the milestone schedule to support the MPS2 OIP with regard to Reliable Spent Fuel Implementation. This section provides the activity status of each item, and the expected completion date, noting any change. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit Overall Integrated Plan	February 2013	Complete	
Commence Engineering and Design	March 2013	Complete	

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Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Complete Engineering and Design	September 2014	Complete	
Complete Procurement of SFP Instruments	August 2014	Complete	
Commence Installation of SFP Instruments	February 2015	Complete	
Level Measurement System Functional	May 2015	Not started	September 2015*

^{*} The revised milestone target completion date for "Level Measurement System Functional" does not impact the Order implementation date for MPS2 (i.e., End of the Fall 2015 Refueling Outage).

4 Changes to Compliance Method

There are no changes to DNC's compliance method with NEI 12-02 (Reference 4).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

DNC expects to comply with the Order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

No open items were identified in the MPS2 OIP for Order EA-12-051. However, Requests for Additional Information (RAIs) were identified in the Interim Staff Evaluation (ISE) Regarding the Overall Integrated Plan for Implementation of Order EA-12-051 (Reference 5).

Responses to RAIs 2, 7, 8, 9, 10, 11, 13, and 14 contained in the ISE for Order EA-12-051 were provided to the Nuclear Regulatory Commission (NRC) in Attachment 3 to the second Six-Month Status Report dated February 28, 2014 (Reference 6). Responses to the remaining RAIs were provided to the Nuclear Regulatory Commission (NRC) in Attachment 2 to the fourth Six-Month Status Report dated March 2, 2015 (Reference 3).

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One additional item, identified as Safety Evaluation (SE) Review Item 6, was identified during the July 2014 Onsite NRC Audit. SE Review Item 6 was a question regarding the potential effect that Electromagnetic Interference (EMI) may have on the SFPLI. The response to this item was also addressed in Attachment 2 of Reference 3.

The Millstone Power Station, Units 2 and 3 – "Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Instrumentation Related to Orders EA-12-049 and EA-12-051," dated November 17, 2014, (Reference 7) concluded that the SFPLI RAIs and SE Review Item 6 had been evaluated and indicated that further review of these items was not anticipated as Dominion proceeds towards compliance with Order EA-12-051.

7 Potential Interim Staff Evaluation (ISE) Impacts

No potential impacts to the ISE or SE Review Item 6 have been identified since the submittal of last Six-Month Status Report (Reference 3).

8 References

The following references support the update to the MPS2 SFPLI system OIP described in this attachment:

- 1. Dominion Nuclear Connecticut, Inc. letter, Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013.
- 2. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012.
- 3. Dominion Nuclear Connecticut, Inc. letter, Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated March 2, 2015 (Serial No. 14-390B).
- 4. NEI 12-02 (Revision 1), Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated August 2012.

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- 5. Millstone Power Station, Units 2 and 3 letter, Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, dated October 29, 2013.
- 6. Dominion Nuclear Connecticut, Inc. letter, "Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2014 (Serial No. 12-165D).
- 7. Millstone Power Station, Units 2 and 3 "Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Instrumentation Related to Orders EA-12-049 and EA-12-051," dated November 17, 2014 (ML14275A017).