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DEC 30 1999

Docket No. 50-336
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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 2
Deviations From the Licensing Basis of the Safety Parameter Display System

In a letter dated March 11, 1999,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) informed the NRC of resolutions to deviations identified between the Current Licensing Basis (CLB) for the Millstone Unit No. 2 Safety Parameter Display System (SPDS) and the actual SPDS configuration and operation. The purpose of this letter is to provide supplemental information for several of the SPDS deviations in order to clarify NNECO's changes to the CLB.

The CLB deviations requiring clarification or update are listed in Attachment 1. The numbering corresponds to the deviations as itemized in the March 11, 1999, submittal.

There are no commitments contained within this letter.

⁽¹⁾ R. P. Necci to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2 - Response to NRC Inspection Report 50-336/98-206 Item Relating To The Dispositioning of Deviations From the Licensing Basis Of the Safety Parameter Display System (SPDS)," dated March 11, 1999.

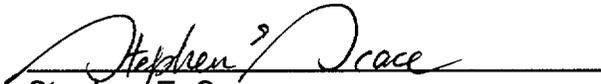
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Should you have any questions on the information provided herein, please contact Mr. R. G. Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: Raymond P. Necci
Vice President - Nuclear Oversight and
Regulatory Affairs

BY: 
Stephen E. Scace
Director - Nuclear Oversight

Attachment (1)

cc: H. J. Miller, Region I Administrator
R. B. Eaton, NRC Senior Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Deviations From the Licensing Basis of the Safety Parameter Display System

Update to Current SPDS Licensing Basis Changes

December 1999

Update to Current Licensing Basis Changes to the SPDS

The SPDS software at Millstone Unit No. 2 is currently being modified in order to be consistent with revised emergency operating procedures and to support an upgrade to the man-machine interface installed on the plant process computer. Modifications include hardware and software changes to add additional points to the Plant Process Computer and to install a new monitor that will provide a dedicated and continuously displayed SPDS in the Control Room. Of the eleven (11) separate deviations from the CLB that have been previously identified,⁽¹⁾ supplemental or updated information is provided below for six (6).

Deviation 4.

Current Licensing Basis:

FSAR section 7.5.5 and NUREG/CR-2627 describe the SPDS as having alarm capability consistent with operator procedure requirements.

Deviation:

The SPDS does not evaluate the status of the critical safety functions and, therefore, does not provide alarms that would indicate violation of a Safety Function Status Check (SFSC).

Updated Revised Licensing Basis:

The status of the critical Safety Functions will be determined by the licensed operators with the assistance of the Shift Technical Advisor (STA). The SPDS continuous display provides a concise display of information to monitor the plant parameters as an early warning of system problems. Display call-up "buttons," one for each safety function, is accessible from any SPDS display for use by the operators/STAs for completion of the Safety Function status determination. The "buttons," allow a one-step call-up of the information needed to complete the Safety Function Status checksheets.

Deviation 7.

Current Licensing Basis:

Reference 3⁽²⁾ states that the SPDS will provide a green color display to indicate when safety functions are not exceeded and red color indication when limits are exceeded.

⁽¹⁾ R. P. Necci to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2 - Response to NRC Inspection Report 50-336/98-206 Item Relating To The Dispositioning of Deviations From the Licensing Basis Of the Safety Parameter Display System (SPDS)," dated March 11, 1999.

⁽²⁾ Reference 3: Letter from J. F. Opeka to Ashok C. Thadani, "Millstone Nuclear Power Station, Unit No. 2, Safety Parameter Display System," dated October 8, 1986.

Deviation:

The SPDS does not evaluate the status of the critical safety functions and, therefore, does not provide this function.

Updated Revised Licensing Basis:

The status of the critical Safety Functions will be determined by the licensed operators with the assistance of the Shift Technical Advisor (STA). The SPDS continuous display provides a concise display of information to monitor the plant parameters as an early warning of system problems. Display call-up "buttons," one for each safety function, is accessible from any SPDS display for use by the operators/STAs for completion of the Safety Function status determination. The "buttons," allow a one-step call-up of the information needed to complete the Safety Function Status checksheets.

Deviation 8.

Current Licensing Basis:

Reference 3 states that the secondary displays of the SPDS will indicate the process values of the SPDS inputs and the criteria used for safety function determination and the display will be accessible directly by a single keystroke.

Deviation:

The SPDS does not evaluate the status of the critical safety functions and, therefore, does not provide the criteria used for safety function determination.

Updated Revised Licensing Basis:

The status of the critical Safety Functions will be determined by the licensed operators with the assistance of the STA. The SPDS provides information for the status of critical Safety Functions by providing discrete "buttons" to display the desired information for each of the Safety Functions. These secondary displays are designed to aid in this determination by providing process values.

Deviation 9.

Current Licensing Basis:

Reference 3 states that all display page changes will be operator initiated and not computer initiated.

Deviation:

The SPDS page selection following a reactor trip and during the transition from pre-SRAS to post-SRAS conditions are computer initiated.

Updated Revised Licensing Basis:

The SPDS page selection following a reactor trip and during the transition from pre-SRAS to post-SRAS conditions will be computer initiated. The SPDS displays are automatically shown following a reactor trip or transition from pre to post SRAS

including "buttons" for each safety function to assist the operating crew and STA completing the Safety Function Status determination.

Deviation 10.

Current Licensing Basis:

FSAR section 7.5.5.5 and Reference 3 state that each page of display shows the status of the six safety functions.

Deviation:

The SPDS does not evaluate the status of the critical safety functions and, therefore, does not provide this function.

Updated Revised Licensing Basis:

The status of the critical Safety Functions will be determined by the licensed operators with the assistance of the Shift Technical Advisor (STA). The SPDS continuous display provides a concise display of information to monitor the plant parameters as an early warning of system problems. Display call-up "buttons," one for each safety function, is accessible from any SPDS display for use by the operators/STAs for completion of the Safety Function status determination. The "buttons," allow a one-step call-up of the information needed to complete the Safety Function Status checksheets.

Deviation 11.

Current Licensing Basis:

NUREG-0737, Supplement 1 to NUREG-0737, and Reference 3 describe the requirement for a continuous display function of the SPDS.

Deviation:

None

Updated Revised Licensing Basis:

The continuous display function of the SPDS is currently administratively controlled to ensure that at least one of the four Control Room display monitors shows the SPDS overview. A modification package has been approved to install a new monitor dedicated to continuously display SPDS in the Unit 2 Control Room.