Template 058

March 30, 2000

Mr. S. E. Scace - Director
Nuclear Oversight and Regulatory Affairs
c/o Mr. David A. Smith
Northeast Nuclear Energy Company
P. O. Box 128
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2 - ISSUANCE OF AMENDMENT RE: CHARGING AND HIGH PRESSURE SAFETY INJECTION PUMP SURVEILLANCE REQUIREMENTS (TAC NO. MA7309)

Dear Mr. Scace:

The Commission has issued the enclosed Amendment No. 243 to Facility Operating License No. DPR-65 for the Millstone Nuclear Power Station, Unit No. 2, in response to your application dated December 6, 1999, as supplemented by letters dated February 22 and March 14, 2000.

The amendment modifies the Technical Specifications (TSs) surveillance requirements associated with ensuring a limited number of charging and high pressure safety injection pumps are capable of injecting into the Reactor Coolant System when the plant is shutdown. In addition, the TS Bases are modified to address these changes.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/
Jacob I. Zimmerman, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosures: 1. Amendment No. 243 to DPR-65
2. Safety Evaluation

cc w/encls: See next page

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

March 30, 2000

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Nuclear Oversight and Regulatory Affairs
c/o Mr. David A. Smith
Northeast Nuclear Energy Company
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Jacob I. Zimmerman, Project Manager, Section 2
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2. Safety Evaluation

cc w/encls: See next page

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Unit 2

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Unit 2

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

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

DOCKET NO. 50-336

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 243
License No. DPR-65

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Northeast Nuclear Energy Company, et al. (the licensee) dated December 6, 1999, as supplemented by letters dated February 22 and March 14, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-65 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 243 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance, and shall be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

B.C. Buckley for

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 30, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 243

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

Replace the following pages of the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
3/4 1-11	3/4 1-11
3/4 1-13	3/4 1-13
3/4 4-21b	3/4 4-21b
B 3/4 1-3	B 3/4 1-3
B 3/4 4-7b	B 3/4 4-7b
B 3/4 4-7c	B 3/4 4-7c

CHARGING PUMP - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.3 At least one charging pump in the boron injection flow path required OPERABLE pursuant to Specification 3.1.2.1 shall be OPERABLE. A maximum of two charging pumps shall be capable of injecting into the RCS.

APPLICABILITY: MODES 5 and 6.

ACTION:

a. With no charging pump OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes until one charging pump is restored to OPERABLE status.

b. With more than two charging pumps capable of injecting into the RCS take immediate action to comply with 3.1.2.3.

SURVEILLANCE REQUIREMENTS

4.1.2.3.1 The above required charging pump shall be demonstrated OPERABLE at least once per 31 days by:

a. Starting (unless already operating) the pump from the control room, and

b. Verifying pump operation for at least 15 minutes.

4.1.2.3.2 One charging pump shall be demonstrated not capable of injecting into the RCS at least once per 12 hours.

CHARGING PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.4 At least two** charging pumps shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4*.

ACTION:

a. With only one charging pump OPERABLE, restore at least two charging pumps to OPERABLE status within 48 hours or be in HOT STANDBY within the next 4 hours; restore at least two charging pumps to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the next 36 hours.

b. With more than two charging pumps capable of injecting into the RCS and the temperature of one or more of the RCS cold legs < 300°F, take immediate action to comply with 3.1.2.4.

SURVEILLANCE REQUIREMENTS

4.1.2.4.1 Two charging pumps shall be demonstrated OPERABLE at least once per 31 days on a STAGGERED TEST BASIS by:

a. Starting (unless already operating) each pump from the control room, and

b. Verifying that each pump operates for at least 15 minutes.

4.1.2.4.2 One charging pump shall be demonstrated not capable of injecting into the RCS at least once per 12 hours whenever the temperature of one or more of the RCS cold legs is < 300°F.

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*The provisions of Specification 3.0.4 and 4.0.4 are not applicable for entry into MODE 4 for the charging pump that is inoperable pursuant to Specification 3.4.9.3 provided the charging pump is restored to OPERABLE status within at least 4 hours or prior to entering MODE 3, whichever comes first.

**A maximum of two charging pumps shall be capable of injecting into the RCS whenever the temperature of one or more of the RCS cold legs is less than 300°F.

SURVEILLANCE REQUIREMENT

4.4.9.3.1 Each PORV shall be demonstrated OPERABLE by:

a. Performance of a CHANNEL FUNCTIONAL TEST on the PORV actuation channel, but excluding valve operation, within 31 days prior to entering a condition in which the PORV is required OPERABLE and at least once per 31 days thereafter when the PORV is required OPERABLE.

b. Performance of a CHANNEL CALIBRATION on the PORV actuation channel at least once per 18 months.

c. Verifying the PORV block valve is open at least once per 72 hours when the PORV is being used for overpressure protection.

d. Testing in accordance with the inservice test requirements of Specification 4.0.5.

4.4.9.3.2 Verify no more than the maximum allowed number of charging pumps are capable of injecting into the RCS at least once per 12 hours.

4.4.9.3.3 Verify no more than the maximum allowed number of HPSI pumps are capable of injecting into the RCS at least once per 12 hours.

4.4.9.3.4 Verify the required RCS vent is open at least once per 31 days when the vent pathway is provided by vent valve(s) that is(are) locked, sealed, or otherwise secured in the open position, otherwise, verify the vent pathway at least once per 12 hours.

3/4.1.2 BORATION SYSTEMS (Continued)

The analysis to determine the boration requirements assumed that the Reactor Coolant System is borated concurrently with cooldown. In the limiting situation when letdown is not available, the cooldown is assumed to be initiated within 26 hours and cooldown to 220°F, is completed in the next 28 hours.

With the RCS temperature below 200°F, one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity change in the event the single injection system becomes inoperable.

The boron capability required below 200°F is based upon providing a SHUTDOWN MARGIN within the limit specified in the CORE OPERATING LIMITS REPORT at 140°F after xenon decay. This condition requires either 3750 gallons of 2.5% boric acid solution from the boric acid tanks or 57,300 gallons of 1720 ppm borated water from the refueling water storage tank.

The maximum boron concentration requirement (3.5%) and the minimum temperature requirement (55°F) for the Boric Acid Storage Tank ensures that boron does not precipitate in the Boric Acid System. The daily surveillance requirement provides sufficient assurance that the temperature of the tank will be maintained higher than 55°F at all times.

A minimum boron concentration of 1720 ppm is required in the RWST at all times in order to satisfy safety analysis assumptions for boron dilution incidents and other transients using the RWST as a borated water source as well as the analysis assumption to determine the boration requirement to ensure adequate shutdown margin.

A maximum of two charging pumps capable of injecting into the RCS when RCS temperature is less than 300°F, ensures that the maximum inadvertent dilution flow rate as assumed in the boron dilution analysis is 88 gallons per minute.

A charging pump can be considered to be not capable of injecting into the RCS by use of any of the following methods and the appropriate administrative controls.

1. Placing the motor circuit breaker in the open position.

2. Removing the charging pump motor overload heaters from the charging pump circuit.

3. Removing the charging pump motor controller from the motor control center.

input from the secondary system. They also ensure sufficient steam volume exists in the pressurizer to accommodate the insurge. No credit for PORV actuation was assumed in the LTOP analysis of the energy addition transient.

The restrictions apply only to the start of the first RCP. Once at least one RCP is running, equilibrium is achieved between the primary and secondary temperatures, eliminating any significant energy addition associated with the start of the second RCP.

The LTOP restrictions are based on RCS cold leg temperature. This temperature will be determined by using RCS cold leg temperature indication when RCPs are running, or natural circulation if it is occurring. Otherwise, SDC return temperature indication will be used.

Restrictions on RCS makeup pumping capacity are included in Technical Specification 3.4.9.3. These restrictions are based on balancing the requirements for LTOP and shutdown risk. For shutdown risk reduction, it is desirable to have maximum makeup capacity and to maintain the RCS full (not vented). However, for LTOP it is desirable to minimize makeup capacity and vent the RCS. To satisfy these competing requirements, makeup pumps can be made not capable of injecting, but available at short notice.

A charging pump can be considered to be not capable of injecting into the RCS by use of any of the following methods and the appropriate administrative controls.

1. Placing the motor circuit breaker in the open position.

2. Removing the charging pump motor overload heaters from the charging pump circuit.

3. Removing the charging pump motor controller from the motor control center.

A HPSI pump can be considered to be not capable of injecting into the RCS by use of any of the following methods and the appropriate administrative controls.

1. Racking down the motor circuit breaker from the power supply circuit.

2. Shutting and tagging the discharge valve with the key lock on the control panel (2-SI-654 or 2-SI-656).

3. Placing the pump control switch in the pull-to-lock position and removing the breaker control power fuses.

4. Placing the pump control switch in the pull-to-lock position and shutting the discharge valve with the key lock on the control panel (2-SI-654 or 2-SI-656).

These methods to prevent charging pumps and HPSI pumps from injecting into the RCS, when combined with the appropriate administrative controls, meet the requirement for two independent means to prevent pump injection as a result of a single failure or inadvertent single action.

These methods prevent inadvertent pump injections while allowing manual actions to rapidly restore the makeup capability if conditions require the use of additional charging or HPSI pumps for makeup in the event of a loss of RCS inventory or reduction in shutdown margin.

If a loss of RCS inventory or reduction in shutdown margin event occurs, the appropriate response will be to correct the situation by starting RCS makeup pumps. If the loss of inventory or shutdown margin is significant, this may necessitate the use of additional RCS makeup pumps that are being maintained not capable of injecting into the RCS in accordance with Technical Specification 3.4.9.3. The use of these additional pumps to restore RCS inventory or shutdown margin will require entry into the associated action statement. The action statement requires immediate action to comply with the specification. The restoration of RCS inventory or shutdown margin can be considered to be part of the immediate action to restore the additional RCS makeup pumps to a not capable of injecting status. While recovering RCS inventory or shutdown margin, RCS pressure will be maintained below the Appendix G limits. After RCS inventory or shutdown margin has been restored, the additional pumps should be immediately made not capable of injecting and the action statement exited.

An exception to Technical Specification 3.0.4 is specified for Technical Specification 3.4.9.3 to allow a plant cooldown to MODE 5 if one or both PORVs are inoperable. MODE 5 conditions may be necessary to repair the PORV(s).

3/4.4.10 STRUCTURAL INTEGRITY

The inservice inspection and testing programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity and operational readiness of these components will be maintained at an acceptable level throughout the life of the plant. These programs are in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50.55a.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 243

TO FACILITY OPERATING LICENSE NO. DPR-65

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

1.0 INTRODUCTION

By letter dated December 6, 1999, as supplemented by letters dated February 22 and March 14, 2000, Northeast Nuclear Energy Company (NNECO or the licensee), the licensee of Millstone Nuclear Power Station, Unit No. 2 (Millstone 2), proposed a technical specifications (TSs) change that modifies the plant TSs and TSs Bases for the reactivity control systems and the reactor coolant system (RCS) overpressure protection systems. The changes involve removal from the TSs of the specific mechanisms for demonstrating a charging pump or a high pressure injection pump is incapable of injecting into the RCS and relocating the specific mechanisms with the criteria for acceptably demonstrating the pumps are incapable of injecting into the RCS into the TSs Bases. The staff has reviewed the proposed changes and the basis for the changes and concluded that the proposed amendment is acceptable. The February 22 and March 14, 2000, supplemental letters provided clarifying information that did not change the staff's original no significant hazards consideration determination or expand the scope of the application as published.

2.0 EVALUATION

2.1 TS 3/4.1.2 Boration Systems

Surveillance Requirement (SR) 4.1.2.3.1 requires that while the unit is shut down, one charging pump be demonstrated not capable of injecting into the RCS at least once per 12 hours by verifying that the motor circuit breaker is in the open position. The licensee is modifying the SR to eliminate how the charging pump is verified to be not capable of injecting by deleting the phrase "by verifying that the motor circuit breaker is in the open position." SR 4.1.2.4.1 requires that while in Modes 1, 2, 3, and 4 with the RCS temperature below 300°F, one charging pump be demonstrated not capable of injecting into the RCS at least once per 12 hours by verifying that the motor circuit breaker is in the open position. The licensee is making the same modification to this SR. The TSs Bases 3/4.1.2 are also being modified to include the statements removed from the SR and to add two additional methods of demonstrating the pumps are not capable of injecting. The two additional methods are the use of administrative controls combined with either 1) removing the charging pump motor overload heaters from the

charging pump circuit, or 2) removing the charging pump motor controller from the motor control center. The licensee has stated that both of these methods break electrical continuity between the power supply and the pump and are effectively the same as opening the pump circuit breaker.

As a result, these mechanisms satisfy the criteria that two independent means prevent the injection of water into the RCS and prevent any single failure or action from causing pump injection. The licensee is including this criteria in the TSs Bases for the RCS overpressure protection systems. These changes, locating the general criteria and specific mechanism for demonstrating that the pumps are incapable of injecting into the RCS in the TSs Bases, are consistent with the standard technical specifications for Combustion Engineering Plants contained in NUREG-1432, Revision 1 and the staff finds the changes to be acceptable. The staff finds that the additional specific mechanisms for demonstrating the pumps are not capable of injecting into the RCS are also acceptable because each mechanism provides two means of preventing injection into the RCS and no single failure or action will cause injection into the RCS.

2.2 TS 3/4.4.9 Pressure/Temperature Limits

SR 4.4.9.3.2 requires that while the low-temperature overpressure protection system is required to be operable, verify that no more than the maximum allowed charging pumps are capable of injecting into the RCS at least once per 12 hours by verifying that the motor circuit breaker is in the open position. The licensee is modifying the SR to eliminate how the charging pump is verified to be not capable of injecting by deleting the sentence "This is accomplished for each charging pump prevented from injecting into the RCS by verifying that the motor circuit breaker is in the open position." The TSs Bases 3/4.9 is being modified to include the statements removed from the SR and add two additional methods of demonstrating the pumps are not capable of injecting. The two additional methods are the use of administrative controls combined with either 1) removing the charging pump motor overload heaters from the charging pump circuit, or 2) removing the charging pump motor controller from the motor control center. The licensee has stated that both of these methods break electrical continuity between the power supply and the pump and are effectively the same as opening the pump circuit breaker. As a result, these mechanisms satisfy the criteria that two independent means prevent the injection of water into the RCS and prevent any single failure or action from causing pump injection. The licensee is also including this criteria in the TSs Bases. These changes, locating the general criteria and specific mechanism for demonstrating that the pumps are incapable of injecting into the RCS in the TSs Bases, are consistent with the standard technical specifications for Combustion Engineering Plants contained in NUREG-1432, Revision 1 and the staff finds the changes to be acceptable. The staff finds that the additional specific mechanisms for demonstrating the pumps are not capable of injecting into the RCS are also acceptable because each mechanism provides two means of preventing injection into the RCS and no single failure or action will cause injection into the RCS.

SR 4.4.9.3.3 requires that while the low-temperature overpressure protection system is required to be operable verify that no more than the maximum allowed high pressure safety injection pumps are capable of injecting into the RCS at least once per 12 hours. The TS enumerates the four mechanisms for accomplishing the verification. The licensee is removing the four mechanisms from the TS and relocating the mechanisms to the TSs Bases. In addition to

relocating the four mechanisms to the Bases, the licensee is also including the criteria for demonstrating that the pumps are incapable of injecting. The criteria that is being added to the TSs Bases is that two independent means are required to prevent injection into the RCS and that no single failure or action will result in pump injection. This change, locating the general criteria and specific mechanism for demonstrating the pumps are incapable of injecting into the RCS in the TSs Bases, is consistent with the standard technical specifications for Combustion Engineering Plants contained in NUREG-1432, Revision 1; and, the staff finds the change to be acceptable.

The staff has reviewed the licensee's amendment request, the revised TSs, the revised TSs Bases, and the supporting technical justification and found the amendment to be acceptable. The staff finds the amendment to be acceptable because the licensee has stated that the additional mechanisms proposed for demonstrating that the charging pumps are incapable of injecting satisfy the criteria that two independent means prevent the injection of water into the RCS and prevent any single failure or action from causing pump injection. Additionally, the information the licensee is relocating into the TSs Bases is consistent with the standard technical specifications for Combustion Engineering Plants contained in NUREG-1432, Revision 1. The staff does not object to the proposed TSs Bases changes.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (65 FR 4285). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: C. Jackson

Date: March 30, 2000