



**Northeast  
Nuclear Energy**

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station  
Northeast Nuclear Energy Company  
P.O. Box 128  
Waterford, CT 06385-0128  
(860) 447-1791  
Fax (860) 444-4277

The Northeast Utilities System

APR 12 2000

Docket No. 50-336  
B18075

Re: 10 CFR 50.90

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

**Millstone Nuclear Power Station, Unit No. 2  
Change to Technical Specifications  
Updating List of Documents Describing the Analytical Methods Specified in  
Technical Specification 6.9.1.8b.1 (TSCR 2-08-00)**

Pursuant to 10 CFR 50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License DPR-65 by incorporating the attached proposed change into the Millstone Unit No. 2 Technical Specifications. The proposed change will correct an administrative error in reference 6.9.1.8b.1 of the list of documents specified in Technical Specification 6.9.1.8b.1. This list of documents describes the analytical methods used to determine the core operating limits.

Attachment 1 provides a discussion of the proposed change and the Safety Summary. Attachment 2 provides the Significant Hazards Consideration. Attachment 3 provides the marked-up version of the appropriate page of the current Technical Specifications. Attachment 4 provides the retyped page of the Technical Specifications.

Environmental Considerations

NNECO has reviewed the proposed License Amendment Request against the criteria of 10 CFR 51.22 for environmental considerations. This change will not significantly increase the type and amounts of effluents that may be released offsite. In addition, this amendment request will not significantly increase individual or cumulative occupational radiation exposures. Therefore, NNECO has determined the proposed change will not have a significant effect on the quality of the human environment.

Conclusions

The proposed change does not involve a significant impact on public health and safety (see the Safety Summary provided in Attachment 1) and does not involve a Significant Hazards Consideration pursuant to the provisions of 10 CFR 50.92 (see the Significant Hazards Consideration provided in Attachment 2).

Plant Operations Review Committee and Nuclear Safety Assessment Board

The Plant Operations Review Committee and Nuclear Safety Assessment Board have reviewed and concurred with the determinations.

Schedule

We request issuance of this amendment to support the restart of Millstone Unit No. 2 from the refueling outage 13, and to be implemented prior to entering Mode 2, which is currently scheduled for May 28, 2000.

State Notification

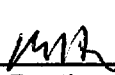
In accordance with 10 CFR 50.91(b), a copy of this License Amendment Request is being provided to the State of Connecticut.

There are no regulatory commitments contained within this letter.

If you should have any questions regarding this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

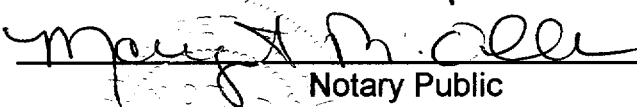
Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
\_\_\_\_\_  
M. H. Brothers  
Vice President - Nuclear Operations

Subscribed and sworn to before me

this 12 day of April, 2000

  
\_\_\_\_\_  
Notary Public

Date Commission Expires: Jun 30 2004

cc: See next page

Attachments (4)

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

Director  
Bureau of Air Management  
Monitoring and Radiation Division  
Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Change to Technical Specifications  
Updating List of Documents Describing the Analytical Methods Specified in  
Technical Specification 6.9.1.8b.1  
Discussion of Change

**Change to Technical Specifications**  
**Updating List of Documents Describing the Analytical Methods Specified in**  
**Technical Specification 6.9.1.8b.1**  
**Discussion of Change**

Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License DPR-65 by incorporating the attached proposed change into the Millstone Unit No. 2 Technical Specifications. The proposed change will correct an administrative error in reference 6.9.1.8b.1 of the list of documents specified in Technical Specifications 6.9.1.8b.1. This list of documents describes the analytical methods used to determine the core operating limits.

Background

In a letter dated September 21, 1999,<sup>(1)</sup> NNECO was notified by the vendor, Siemens Power Corporation, of revision to some of the analytical methods references in Millstone Unit No. 2 Technical Specifications. Based on the vendor notification, NNECO requested changes in Millstone Unit No. 2 Technical Specifications to update the list of documents describing the analytical methods in a letter dated November 23, 1999.<sup>(2)</sup> In a letter dated March 17, 2000,<sup>(3)</sup> the Nuclear Regulatory Commission (NRC) issued Amendment No. 242 in response to NNECO's request. This amendment updated the list of documents describing the analytical methods used to determine the core operating limits specified in Technical Specification 6.9.1.8b.1. In a letter dated March 29, 2000,<sup>(4)</sup> NNECO was notified by the vendor of an error in the document date in reference 6.9.1.8b.1. The vendor's letter stated: "This document was referenced in the first letter (dated September 21, 1999) with a date of February 1995 which was in error. The report title, document number, and report content are correct as identified with the original letter. The report was first issued in May 1996 for NRC review and after receiving NRC approval in October 1996, the approved version of this report was issued in January 1997. The calculations, performed for Cycle 14 and future reloads, are not impacted by this error and remain valid." The vendor's letter also stated: "SPC has reviewed all the other references under 6.9.1.8b.1 and reconfirmed that all those references are correct as shown."

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<sup>(1)</sup> R. I. Wescott letter to NNECO, "Revision to Analytical Methods in Millstone Unit No. 2 Technical Specification," dated September 21, 1999.

<sup>(2)</sup> R. P. Necci letter to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Changes to Technical Specifications, Updating List of Documents Describing the Analytical Methods Specified in Technical Specification 6.9.1.8b," dated November 23, 1999.

<sup>(3)</sup> J. I. Zimmerman letter to NNECO, "Millstone Nuclear Power Station, Unit No. 2 - Issuance of Amendment Re: Updating Core Operating Limits Report Documents List (TAC NO. MA7308)," dated March 17, 2000.

<sup>(4)</sup> R. I. Wescott letter to NNECO, "Revision to Analytical Methods in Millstone Unit No. 2 Technical Specification (Revised)," dated March 29, 2000.

This error has no impact on the actual analytical methods used to determine the core operating limits, nor does it have impact on the calculations performed for Cycle 14 or future reloads. Therefore, this error is administrative in nature. The other references under 6.9.1.8b.1 have been reviewed and found to be correct as implemented by Amendment No. 242.

#### Description of Proposed Change

The proposed change will revise the date in reference 6.9.1.8b.1 from "February 1995" to "January 1997." This change has no impact on the actual analytical methods used to determine the core operating limits, nor does it have impact on the calculations performed for Cycle 14 or future reloads. Therefore, this change is administrative in nature.

#### Safety Summary

The proposed change will revise the date in reference 6.9.1.8b.1 from "February 1995" to "January 1997." This change is administrative in nature since it has no impact on the actual analytical methods used to determine the core operating limits, the calculations performed for Cycle 14, and the calculations for future reloads. Therefore, the proposed change will have no adverse effect on plant safety.

**Attachment 2**

**Millstone Nuclear Power Station, Unit No. 2**

**Change to Technical Specifications  
Updating List of Documents Describing the Analytical Methods Specified in  
Technical Specification 6.9.1.8b.1  
Significant Hazards Consideration**

**Proposed Revision to Technical Specifications  
Updating List of Documents Describing the Analytical Methods Specified in  
Technical Specification 6.9.1.8b.1  
Significant Hazards Consideration**

Significant Hazards Consideration

In accordance with 10 CFR 50.92, Northeast Nuclear Energy Company (NNECO) has reviewed the proposed change and has concluded that it does not involve a Significant Hazards Consideration (SHC). The basis for this conclusion is that the three criteria of 10 CFR 50.92(c) are not compromised. The proposed change does not involve an SHC because the change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change will revise the date in reference 6.9.1.8b.1 from "February 1995" to "January 1997." The report title and document number are correct and remain the same as identified in Amendment No. 242. This change is administrative in nature since it does not have any impact on the actual analytical methods used to determine the core operating limits, the calculations performed for Cycle 14, and the calculations for future reloads. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change will revise the date in reference 6.9.1.8b.1 from "February 1995" to "January 1997." The proposed change is administrative in nature. This change will not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. It does not alter the way any structure, system, or component functions and does not alter the manner in which the plant is operated. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

The proposed change will revise the date in reference 6.9.1.8b.1 from "February 1995" to "January 1997." This change is administrative in nature. Therefore, the proposed change will not result in a significant reduction in a margin of safety.



**Attachment 3**

**Millstone Nuclear Power Station, Unit No. 2**

**Change to Technical Specifications  
Updating List of Documents Describing the Analytical Methods Specified in  
Technical Specification 6.9.1.8b.1  
Marked Up Page**

## ADMINISTRATIVE CONTROLS

- d. Documentation of all failures (inability to lift or reclose within the tolerances allowed by the design basis) and challenges to the pressurizer PORVs or safety valves.

### ANNUAL RADIOACTIVE EFFLUENT REPORT

- 6.9.1.6 A routine Annual Radioactive Effluent Report covering the operation of the unit during the previous calendar year of operation shall be submitted by May 1 of each year.

The report shall include that information delineated in the REMODCM.

Any changes to the REMODCM shall be submitted in the Annual Radioactive Effluent Report.

### MONTHLY OPERATING REPORT

- 6.9.1.7 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator, Region I, and one copy to the NRC Resident Inspector, no later than the 15th of each month following the calendar month covered by the report.

### CORE OPERATING LIMITS REPORT

- 6.9.1.8 a. Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle.

|           |  |
|-----------|--|
| 3/4.1.1.1 | SHUTDOWN MARGIN - $T_{avg} > 200^{\circ}\text{F}$    |
| 3/4.1.1.2 | SHUTDOWN MARGIN - $T_{avg} \leq 200^{\circ}\text{F}$ |
| 3/4.1.1.4 | Moderator Temperature Coefficient                    |
| 3/4.1.3.6 | Regulating CEA Insertion Limits                      |
| 3/4.2.1   | Linear Heat Rate                                     |
| 3/4.2.3   | Total Integrated Radial Peaking Factor - $F_r^T$     |
| 3/4.2.6   | DNB Margin   |

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

- 1) EMF-96-029(P)(A) Volumes 1 and 2, "Reactor Analysis System for PWRs Volume 1 - Methodology Description, Volume 2 - Benchmarking Results," Siemens Power Corporation, ~~February~~ January 1997 1995.
- 2) ANF-84-73 Revision 5 Appendix B (P)(A), "Advanced Nuclear Fuels Methodology for Pressurized Water Reactors: Analysis of Chapter 15 Events," Advanced Nuclear Fuels, July 1990.

**Attachment 4**

**Millstone Nuclear Power Station, Unit No. 2**

**Change to Technical Specifications  
Updating List of Documents Describing the Analytical Methods Specified in  
Technical Specification 6.9.1.8b.1  
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## ADMINISTRATIVE CONTROLS

- d. Documentation of all failures (inability to lift or reclose within the tolerances allowed by the design basis) and challenges to the pressurizer PORVs or safety valves.

### ANNUAL RADIOACTIVE EFFLUENT REPORT

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| 3/4.1.1.1 | SHUTDOWN MARGIN - $T_{avg} > 200^{\circ}\text{F}$    |
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| 3/4.1.1.4 | Moderator Temperature Coefficient                    |
| 3/4.1.3.6 | Regulating CEA Insertion Limits                      |
| 3/4.2.1   | Linear Heat Rate                                     |
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