



**Northeast
Nuclear Energy**

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The Northeast Utilities System

JUN 26 2000

Docket Nos. 50-336
50-423
B18153

Re: 10 CFR 50.90

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

Millstone Nuclear Power Station, Unit Nos. 2 and 3
Change to Technical Specifications
Changes In Technical Specifications Related To Reactivity Control Systems
(TSCR 2-12-00 and TSCR 3-8-00)

Pursuant to 10 CFR 50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating Licenses DPR-65 and NPF-49 by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit Nos. 2 and 3. The proposed amendments will address changes in Technical Specifications related to Reactivity Control Systems. The proposed changes affect Millstone Unit No. 2 Technical Specification 3/4.1.3.1, "Reactivity Control Systems, Movable Control Assemblies, Full Length CEA Position," and Millstone Unit No. 3 Technical Specification 3/4.1.3.1, "Reactivity Control Systems, Movable Control Assemblies, Group Height." The proposed changes will revise the frequency for determining the operability of each rod not inserted fully in the core from once every 31 days to once every 92 days.

Attachment 1 provides a discussion of the proposed changes and the safety summary. Attachment 2 provides the Significant Hazards Consideration. Attachments 3 and 4 provide the marked-up version of the appropriate pages of the current Technical Specifications for Unit Nos. 2 and 3 respectively. Attachments 5 and 6 provide the retyped pages of the Technical Specifications for Unit Nos. 2 and 3 respectively.

ADD1

Environmental Considerations

NNECO has reviewed the proposed License Amendment Request against the criteria of 10 CFR 51.22 for environmental considerations. These changes 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 changes will not have a significant effect on the quality of the human environment.

Conclusions

The proposed changes do not involve a significant impact on public health and safety (see the Safety Summary provided in Attachment 1) and do 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 by the end of February, 2001, with the amendments to be implemented within 60 days of issuance.

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



Raymond P. Necci
Vice President - Nuclear Technical Services

Sworn to and subscribed before me

this 26 day of June, 2000



Notary Public

My Commission expires Jun 30 2004

Attachments (6)

cc: H. J. Miller, Region I Administrator
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Change to Technical Specifications
Changes In Technical Specifications Related To Reactivity Control Systems
(TSCR 2-12-00 and TSCR 3-8-00)
Discussion of Changes

Change to Technical Specifications
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(TSCR 2-12-00 and TSCR 3-8-00)
Discussion of Changes

Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating Licenses DPR-65 and NPF-49 by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit Nos. 2 and 3. The proposed amendments will address changes in Technical Specifications related to Reactivity Control Systems. The proposed changes affect Millstone Unit No. 2 Technical Specification 3/4.1.3.1, "Reactivity Control Systems, Movable Control Assemblies, Full Length CEA Position," and Millstone Unit No. 3 Technical Specification 3/4.1.3.1, "Reactivity Control Systems, Movable Control Assemblies, Group Height."

Description of Proposed Changes

Millstone Unit No. 2:

1. The frequency of performing Specification 4.1.3.1.2 is decreased from once every 31 days to once every 92 days.
2. The frequency of performing Specification 4.1.3.1.3 is decreased from once every 31 days to once every 92 days.

Millstone Unit No. 3:

The frequency of performing Specification 4.1.3.1.2 is decreased from once every 31 days to once every 92 days.

Justification of Changes:

- A. Decreasing the frequency of performing Specification 4.1.3.1.2 for Millstone Unit Nos. 2 and 3 from once every 31 days to once every 92 days:

Background:

In December 1992, the NRC issued NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," to provide the results of a comprehensive examination of surveillance testing required by technical specifications. The NRC determined that while the majority of testing at power is important, safety can be improved, equipment degradation decreased, and an unnecessary burden on personnel resources eliminated by reducing the amount of testing that the technical specifications require during power operation. On September 27, 1993, the NRC issued Generic Letter 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing

During Power Operation." Licensees have been encouraged to propose changes to their technical specifications that are consistent with the guidance provided in the generic letter.

Justification:

The proposed change to Surveillance 4.1.3.1.2 will revise the frequency for determining the operability of each rod that is not fully inserted in the core from once every 31 days to once every 92 days. NUREG-1366 states:

"In view of the successful operational record demonstrated by the control rod movement tests during power operation, the NRC staff recommends that the surveillance interval for control rod testing be changed from every 31 days to quarterly."

The rationale presented in NUREG-1366 for this change were: 1) most stuck rods are discovered during plant startup during initial pulling of the rods or during rod drop testing; and 2) this high risk test could potentially cause reactor trips, dropped rods, and unnecessary challenges to safety systems. Additionally, NNECO performed Millstone Unit Nos. 2 and 3 specific evaluations of the effect of changing the frequency of rod movement test from 31 days to 92 days on Core Damage Frequency (CDF). These evaluations concluded that the change in test frequency from 31 days to 92 days has no adverse impact on CDF (the estimated potential risk associated with tripping the reactor as a result of this high risk surveillance is about $1.31E-8$ /yr for Millstone Unit No. 2 and $4.28E-8$ /yr for Millstone Unit No. 3) and is therefore acceptable. These changes are consistent with NUREG-1432⁽¹⁾ and NUREG-1431.⁽²⁾

- B. Decreasing the frequency of performing Surveillance 4.1.3.1.3 from once every 31 days to once every 92 days for Millstone Unit No. 2:

The frequency of testing the Control Element Assembly (CEA) Deviation Circuit, as described in Surveillance Requirement 4.1.3.1.3, is changed to 92 days. Performing this Surveillance involves movement of the CEAs. This Surveillance is typically performed in conjunction with Surveillance Requirement 4.1.3.1.2 which tests the CEA freedom of movement (trippability). The typical sequence of events for testing one CEA is to verify that the Deviation Circuit is OPERABLE, and then verify the CEA freedom of movement. These steps are then repeated for each individual CEA. Therefore, since the Deviation Circuit verification requires movement of each individual CEA and is performed in conjunction with CEA

⁽¹⁾ NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, dated April 1995.

⁽²⁾ NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, dated April 1995.

freedom of movement test, the frequency for the two Surveillance Requirements should be the same, i.e. every 92 days. Additionally, the Deviation Circuit has excellent testing history and increasing the Surveillance interval from 31 days to 92 days will have no adverse effect on its overall reliability. The NRC approved this increase in Surveillance interval as part of TSTF-127.⁽³⁾

Safety Summary

The proposed change to Millstone Unit Nos. 2 and 3 Surveillance 4.1.3.1.2 will revise the frequency for determining the operability of each rod that is not fully inserted in the core from once every 31 days to once every 92 days. The history of control rod movement tests during power operation of Millstone Unit Nos. 2 and 3 demonstrate successful operational records. The NRC staff recommended that the surveillance interval for control rod testing be changed from every 31 days to quarterly in NUREG-1366 based on the following facts:

- 1) Most stuck rods are discovered during plant startup during initial pulling of the rods or during rod drop testing; and
- 2) This high risk test could potentially cause reactor trips, dropped rods, and unnecessary challenges to safety systems.

For Millstone Unit Nos. 2 and 3, the operability of the shutdown and regulating control rods is an initial assumption in all safety analyses that assume control rod insertion upon reactor trip. The proposed change in the frequency for determining the operability of each rod that is not fully inserted in the core from once every 31 days to once every 92 days does not change any of the assumptions used in the safety analyses. On the other hand, the decrease in surveillance frequency will reduce the reactor trips and the unnecessary challenges to the safety systems associated with the performance of the surveillance. Additionally, NNECO performed Millstone Unit Nos. 2 and 3 specific evaluations of the effect of changing the frequency of rod movement test from 31 days to 92 days on CDF. These evaluations concluded that the change in test frequency from 31 days to 92 days has no adverse impact on CDF (the estimated potential risk associated with tripping the reactor as a result of this high risk surveillance is about $1.31E-8/\text{yr}$ for Millstone Unit No. 2 and $4.28E-8/\text{yr}$ for Millstone Unit No. 3) and is therefore acceptable. Therefore, the proposed changes will have no adverse effect on plant safety. These changes are consistent with NUREG-1432 and NUREG-1431.

For Millstone Unit No. 2, the frequency of testing the CEA Deviation Circuit, as described in Millstone Unit No. 2 Surveillance Requirement 4.1.3.1.3, is changed to 92

⁽³⁾ TSTF-127, "Industry/TSTF Standard Technical Specification Change Traveler, Decrease Frequency to 92 days for CMI and CEA Deviation Circuit Functional Test," NRC approved on June 4, 1996.

days. Performing this Surveillance involves movement of the CEAs. This Surveillance is typically performed in conjunction with Surveillance Requirement 4.1.3.1.2 which tests the CEA freedom of movement (trippability). Therefore, since the CEA Deviation Circuit operability verification requires movement of each individual CEA and is performed in conjunction with CEA freedom of movement test, the frequencies of the two tests should be consistent.

The proposed change in the frequency of testing the CEA Deviation Circuit from once every 31 days to once every 92 days does not change any of the assumptions used in the safety analysis. On the other hand, the decrease in surveillance frequency will reduce the reactor trips and the unnecessary challenges to the safety systems associated with the performance of the surveillance. Additionally, the Deviation Circuit has excellent testing history and increasing the surveillance interval from 31 days to 92 days will have no adverse effect on its overall reliability. Therefore, the proposed change will have no adverse effect on plant safety. The NRC approved this increase in surveillance interval as part of TSTF-127.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 2 and 3

Change to Technical Specifications
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(TSCR 2-12-00 and TSCR 3-8-00)
Significant Hazards Consideration

Change to Technical Specifications
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Significant Hazards Consideration

In accordance with 10 CFR 50.92, Northeast Nuclear Energy Company (NNECO) has reviewed the proposed changes to the Millstone Unit Nos. 2 and 3 Technical Specifications and has concluded that they do 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 changes do not involve an SHC because the changes would not:

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

The proposed change to Millstone Unit Nos. 2 and 3 Specification 4.1.3.1.2 will revise the frequency for determining the operability of each rod that is not fully inserted in the core from once every 31 days to once every 92 days. The proposed change in the frequency does not change any of the assumptions used in the safety analyses. On the other hand, the decrease in surveillance frequency will reduce the potential for reactor trips and the unnecessary challenges to the safety systems associated with the performance of the surveillance. Additionally, NNECO performed Millstone Unit Nos. 2 and 3 specific evaluations of the effect of changing the frequency of rod movement test from 31 days to 92 days on Core Damage Frequency (CDF). These evaluations concluded that the change in test frequency from 31 days to 92 days has no adverse impact on CDF (the estimated potential risk associated with tripping the reactor as a result of this high risk surveillance is about $1.31E-8$ /yr for Millstone Unit No. 2 and $4.28E-8$ /yr for Millstone Unit No. 3) and is therefore acceptable. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

The proposed change in the frequency of testing the CEA Deviation Circuit in Millstone Unit No. 2 Specification 4.1.3.1.3 from once every 31 days to once every 92 days does not change any of the assumptions used in the safety analysis. On the other hand, the decrease in surveillance frequency will reduce the reactor trips and the unnecessary challenges to the safety systems associated with the performance of the surveillance. Additionally, the Deviation Circuit has excellent testing history and increasing the surveillance interval from 31 days to 92 days will have no adverse effect on its overall reliability. The Nuclear Regulatory Commission approved this increase in surveillance interval

as part of TSTF-127.⁽¹⁾ 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 changes will not alter configuration of the plants (no new or different type of equipment will be installed) or require any new or unusual operator actions. They do not alter the way any structure, system, or component functions and do not alter the manner in which the plants are operated. Therefore, the proposed changes 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 changes in the surveillance frequency do not change any of the assumptions used in the safety analyses. Additionally, NNECO performed Millstone Unit Nos. 2 and 3 specific evaluations of the effect of changing the frequency of rod movement test from 31 days to 92 days on CDF. These evaluations concluded that the change in test frequency from 31 days to 92 days has no adverse impact on CDF and is therefore acceptable. Therefore, the proposed changes will not result in a significant reduction in a margin of safety.

As described above, this License Amendment Request does not involve a significant increase in the probability of an accident previously evaluated, does not involve a significant increase in the consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, and does not result in a significant reduction in a margin of safety. Therefore, NNECO has concluded that the proposed changes do not involve an SHC.

⁽¹⁾ TSTF-127, "Industry/TSTF Standard Technical Specification Change Traveler, Decrease Frequency to 92 days for CMI and CEA Deviation Circuit Functional Test," NRC approved on June 4, 1996.

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Attachment 3

Millstone Nuclear Power Station, Unit No. 2

**Change to Technical Specifications
Changes In Technical Specifications Related To Reactivity Control Systems
(TSCR 2-12-00 and TSCR 3-8-00)
Marked Up Pages**

For Information only

REACTIVITY CONTROL SYSTEMS

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

FULL LENGTH CEA POSITION

LIMITING CONDITION FOR OPERATION

3.1.3.1 The CEA Motion Inhibit and all full length (shutdown and regulating) CEAs shall be OPERABLE with each CEA of a given group positioned within 10 steps (indicated position) of all other CEAs in its group. -

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APPLICABILITY: MODES 1* and 2*.

ACTION:

- a. With one or more full length CEAs inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour and be in at least HOT STANDBY within 6 hours.
- b. With the CEA Motion Inhibit inoperable, within 6 hours either:
 1. Restore the CEA Motion Inhibit to OPERABLE status, or
 2. Place and maintain the CEA drive system mode switch in either the "Manual" or "Off" position and fully withdraw all CEAs in group 7 to less than 5% insertion, or
 3. Be in at least HOT STANDBY.
- c. With one full length CEA inoperable (unless immovable as a result of excessive friction or mechanical interference or known to be untrippable) but within its above specified alignment requirements, operation in MODES 1 and 2 may continue for up to 7 days per occurrence with a total accumulated time of ≤ 14 days per calendar year.
- d. With one or more full length CEAs misaligned from any other CEAs in its group by more than 10 steps but less than 20 steps, operation in MODES 1 and 2 may continue, provided that within one hour the misaligned CEA(s) is either:

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* See Special Test Exceptions 3.10.2 and 3.10.5.

REACTIVITY CONTROL SYSTEMS

For Information Only

ACTION (Continued):

1. Restored to OPERABLE status within its above specified alignment requirements, or
2. Declared inoperable and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied. After declaring the CEA inoperable, operation in MODES 1 and 2 may continue for up to 7 days per occurrence with a total accumulated time of ≤ 14 days per calendar year provided all of the following conditions are met:
 - a.) The THERMAL POWER level shall be reduced to $\leq 70\%$ of the maximum allowable THERMAL POWER level for the existing Reactor Coolant Pump combination within one hour; if negative reactivity insertion is required to reduce THERMAL POWER, boration shall be used.
 - b.) Within one hour after reducing the THERMAL POWER as required by a), above, the remainder of the CEAs in the group with the inoperable CEA shall be aligned to within 10 steps of the inoperable CEA while maintaining the allowable CEA sequence and insertion limits of Specification 3.1.3.6. The THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation.
 - c.) The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours.
 - e. With one full length CEA misaligned from any other CEA in its group by 20 steps or more, reduce THERMAL POWER to $\leq 70\%$ of the maximum allowable THERMAL POWER level for the existing Reactor Coolant Pump combination within one hour; if negative reactivity insertion is required to reduce THERMAL POWER, boration shall be used. Within one hour after reducing THERMAL POWER as required above, either:
 1. Restore the CEA to within the above specified alignment requirements, or
 2. Declare the CEA inoperable and determine that the SHUTDOWN MARGIN requirements of Specification 3.1.1.1 is satisfied. After declaring the CEA inoperable, POWER OPERATION may continue for up to 7 days per occurrence with a total accumulated time of ≤ 14 days per calendar year provided the remainder of the CEAs in the group with the inoperable CEA are aligned to within 10 steps of the inoperable CEA

REACTIVITY CONTROL SYSTEMSACTION (Continued):

while maintaining the allowable CEA sequence and insertion limits of Specification 3.1.3.6 and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation.

- f. With more than one full length CEA inoperable or misaligned from any other CEA in its group by 20 steps (indicated position) or more, be in at least HOT STANDBY within 6 hours.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position of each full length CEA shall be determined to be within 10 steps (indicated position) of all other CEAs in its group at least once per 12 hours except during time intervals when the Deviation Circuit and/or CEA Motion Inhibit are inoperable, then verify the individual CEA positions at least once per 4 hours.

4.1.3.1.2 Each full length CEA not fully inserted shall be determined to be OPERABLE by movement of at least 10 steps at least once per ~~31~~ days.

4.1.3.1.3 The CEA Motion Inhibit shall be demonstrated OPERABLE at least once per ~~31~~ days by a functional test of the CEA group deviation circuit which verifies that the circuit prevents any CEA from being misaligned from all other CEAs in its group by more than 10 steps (indicated position).

4.1.3.1.4 The CEA Motion Inhibit shall be demonstrated OPERABLE by a functional test which verifies that the circuit maintains the CEA group overlap and sequencing requirements of Specification 3.1.3.6 and that the circuit prevents the regulating CEAs from being inserted beyond the Transient Insertion Limits of Specification 3.1.3.6:

- a. Prior to each entry into MODE 2 from MODE 3, except that such verification need not be performed more often than once per 31 days, and
- b. At least once per 6 months.

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Attachment 4

Millstone Nuclear Power Station, Unit No. 3

Change to Technical Specifications
Changes In Technical Specifications Related To Reactivity Control Systems
(TSCR 2-12-00 and TSCR 3-8-00)
Marked Up Pages

REACTIVITY CONTROL SYSTEMS

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

For Information Only

GROUP HEIGHT

LIMITING CONDITION FOR OPERATION

3.1.3.1 All full-length shutdown and control rods shall be OPERABLE and positioned within ± 12 steps (indicated position) of their group step counter demand position.

APPLICABILITY: MODES 1* and 2*.

ACTION:

- a. With one or more full-length rods inoperable due to being immovable as a result of excessive friction or mechanical interference or known to be untrippable, determine that the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied within 1 hour and be in HOT STANDBY within 6 hours.
- b. With one full-length rod trippable but inoperable due to causes other than addressed by ACTION a., above, or misaligned from its group step counter demand height by more than ± 12 steps (indicated position), POWER OPERATION may continue provided that within 1 hour:
 1. The rod is restored to OPERABLE status within the above alignment requirements, or
 2. The rod is declared inoperable and the remainder of the rods in the group with the inoperable rod are aligned to within ± 12 steps of the inoperable rod while maintaining the rod sequence and insertion limits of Specification 3.1.3.6. The THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation, or
 3. The rod is declared inoperable and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is satisfied. POWER OPERATION may then continue provided that:
 - a) A reevaluation of each accident analysis of Table 3.1-1 is performed within 5 days; this reevaluation shall confirm that the previously analyzed results of these accidents remain valid for the duration of operation under these conditions;
 - b) The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours;

*See Special Test Exceptions Specifications 3.10.2 and 3.10.3.

REACTIVITY CONTROL SYSTEMSLIMITING CONDITION FOR OPERATIONACTION (Continued)

- c) A power distribution map is obtained from the movable incore detectors and $F_0(Z)$ and F_{AH}^N are verified to be within their limits within 72 hours; and
- d) With four loops operating, the THERMAL POWER level is reduced to less than or equal to 75% of RATED THERMAL POWER within the next hour and within the following 4 hours the High Neutron Flux Trip Setpoint is reduced to less than or equal to 85% of RATED THERMAL POWER, or
- e) With three loops operating, the THERMAL POWER level is reduced to less than or equal to 50% of RATED THERMAL POWER within the next hour and within the following 4 hours the Neutron Flux High Trip Setpoint is reduced to less than or equal to 60% of RATED THERMAL POWER.
- c. With more than one rod trippable but inoperable due to causes other than addressed by ACTION a. above, POWER OPERATION may continue provided that:
1. Within 1 hour, the remainder of the rods in the bank(s) with the inoperable rods are aligned to within ± 12 steps of the inoperable rods while maintaining the rod sequence and insertion limits of Specification 3.1.3.6. The THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation, and
 2. The inoperable rods are restored to OPERABLE status within 72 hours.
- d. With more than one rod misaligned from its group step counter demand height by more than ± 12 steps (indicated position), be in HOT STANDBY within 6 hours.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position of each full-length rod shall be determined to be within the group demand limit by verifying the individual rod positions at least once per 12 hours except during time intervals when the rod position deviation monitor is inoperable, then verify the group positions at least once per 4 hours.

4.1.3.1.2 Each full-length rod not fully inserted in the core shall be determined to be OPERABLE by movement of at least 10 steps in any one direction at least once per ~~31~~ days.

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Attachment 5

Millstone Nuclear Power Station, Unit No. 2

Change to Technical Specifications
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(TSCR 2-12-00 and TSCR 3-8-00)
Retyped Pages

REACTIVITY CONTROL SYSTEMS

ACTION (Continued):

while maintaining the allowable CEA sequence and insertion limits of Specification 3.1.3.6 and the SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours; the THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation.

- f. With more than one full length CEA inoperable or misaligned from any other CEA in its group by 20 steps (indicated position) or more, be in at least HOT STANDBY within 6 hours.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position of each full length CEA shall be determined to be within 10 steps (indicated position) of all other CEAs in its group at least once per 12 hours except during time intervals when the Deviation Circuit and/or CEA Motion Inhibit are inoperable, then verify the individual CEA positions at least once per 4 hours.

4.1.3.1.2 Each full length CEA not fully inserted shall be determined to be OPERABLE by movement of at least 10 steps at least once per 92 days.

4.1.3.1.3 The CEA Motion Inhibit shall be demonstrated OPERABLE at least once per 92 days by a functional test of the CEA group deviation circuit which verifies that the circuit prevents any CEA from being misaligned from all other CEAs in its group by more than 10 steps (indicated position).

4.1.3.1.4 The CEA Motion Inhibit shall be demonstrated OPERABLE by a functional test which verifies that the circuit maintains the CEA group overlap and sequencing requirements of Specification 3.1.3.6 and that the circuit prevents the regulating CEAs from being inserted beyond the Transient Insertion Limits of Specification 3.1.3.6:

- a. Prior to each entry into MODE 2 from MODE 3, except that such verification need not be performed more often than once per 31 days, and
- b. At least once per 6 months.

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Attachment 6

Millstone Nuclear Power Station, Unit No. 3

Change to Technical Specifications
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REACTIVITY CONTROL SYSTEMS

LIMITING CONDITION FOR OPERATION

ACTION (Continued)

- c) A power distribution map is obtained from the movable incore detectors and $F_{\Omega}(Z)$ and $F_{\Delta H}^N$ are verified to be within their limits within 72 hours; and
 - d) With four loops operating, the THERMAL POWER level is reduced to less than or equal to 75% of RATED THERMAL POWER within the next hour and within the following 4 hours the High Neutron Flux Trip Setpoint is reduced to less than or equal to 85% of RATED THERMAL POWER, or
 - e) With three loops operating, the THERMAL POWER level is reduced to less than or equal to 50% of RATED THERMAL POWER within the next hour and within the following 4 hours the Neutron Flux High Trip Setpoint is reduced to less than or equal to 60% of RATED THERMAL POWER.
- c. With more than one rod trippable but inoperable due to causes other than addressed by ACTION a. above, POWER OPERATION may continue provided that:
- 1. Within 1 hour, the remainder of the rods in the bank(s) with the inoperable rods are aligned to within ± 12 steps of the inoperable rods while maintaining the rod sequence and insertion limits of Specification 3.1.3.6. The THERMAL POWER level shall be restricted pursuant to Specification 3.1.3.6 during subsequent operation, and
 - 2. The inoperable rods are restored to OPERABLE status within 72 hours.
- d. With more than one rod misaligned from its group step counter demand height by more than ± 12 steps (indicated position), be in HOT STANDBY within 6 hours.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position of each full-length rod shall be determined to be within the group demand limit by verifying the individual rod positions at least once per 12 hours except during time intervals when the rod position deviation monitor is inoperable, then verify the group positions at least once per 4 hours.

4.1.3.1.2 Each full-length rod not fully inserted in the core shall be determined to be OPERABLE by movement of at least 10 steps in any one direction at least once per 92 days.