

September 14, 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: REACTOR COOLANT LOOPS AND SHUTDOWN  
COOLING TRAINS (TAC NO. MA8089)

Dear Mr. Scace:

The Commission has issued the enclosed Amendment No. 249 to Facility Operating License No. DPR-65 for the Millstone Nuclear Power Station, Unit No. 2, in response to your application dated February 1, 2000, as supplemented on June 1 and July 13, 2000.

This amendment modifies Technical Specification (TS) 3.0.3 to state that this specification is not applicable in MODES 5 or 6. This amendment also makes various changes to TSs 3/4.1, "Reactor Coolant System - Coolant Loops and Coolant Recirculation" and 3/4.9.8, "Refueling Operations - Shutdown Cooling and Coolant Circulation." In addition, various corrections and formats are revised to achieve consistency of the structure and wording of the TS. The Bases for the affected TSs have also been revised accordingly.

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. 249 to DPR-65  
2. Safety Evaluation

cc w/encls: See next page

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cc w/encls: See next page

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Unit 2  
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NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

DOCKET NO. 50-336

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 249

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 February 1, 2000, as supplemented June 1 and July 13, 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. 249 , 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 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

***/RA/***

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: September 14, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 249

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.

<u>Remove</u>	<u>Insert</u>
V	V
IX	IX
3/4 0-1	3/4 0-1
3/4 4-1	3/4 4-1
3/4 4-1a	3/4 4-1a
3/4 4-1b	3/4 4-1b
3/4 4-1c	3/4 4-1c
3/4 4-1d	3/4 4-1d
3/4 4-1e	3/4 4-1e
3/4 4-1f	3/4 4-1f
3/4 4-1g	3/4 4-1g
3/4 4-1h	3/4 4-1h
3/4 9-8	3/4 9-8
3/4 9-8a	3/4 9-8a
3/4 9-8b	3/4 9-8b
B 3/4 4-1	B 3/4 4-1
B 3/4 4-1a	B 3/4 4-1a
B 3/4 4-1b	B 3/4 4-1b
B 3/4 9-2	B 3/4 9-2
B 3/4 9-2a	B 3/4 9-2a

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 249

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 February 1, 2000, as supplemented on June 1 and July 13, 2000, the Northeast Nuclear Energy Company, et al. (the licensee), submitted a request for changes to the Millstone Nuclear Power Station, Unit No. 2 (MNPS-2) Technical Specifications (TSs). The amendment would modify TS 3.0.3 to state that this specification is not applicable in MODES 5 or 6. This amendment also makes various changes to TSs 3/4.1, Reactor Coolant System - Coolant Loops and Coolant Recirculation and 3/4.9.8, Refueling Operations - Shutdown Cooling and Coolant Circulation. In addition, various corrections and formats are revised to achieve consistency of the structure and wording of the TSs. The Bases for the affected TSs have also been revised accordingly.

2.0 EVALUATION

The function of the reactor coolant system (RCS) is to remove heat from the reactor core and internals and transfer it to the secondary (steam generating) system. The RCS, which is entirely located within the containment building, consists of two heat transfer loops connected in parallel across the reactor pressure vessel. Each loop contains one steam generator (SG), two reactor coolant pumps (RCPs), connecting pipe, and flow and temperature instrumentation.

The proposed TS changes and the staff's evaluation of those changes are discussed in the following pages.

2.1 Index Pages

1. Index Page V will be revised to be consistent with the proposed changes to current TSs 3.4.1.3 and 3.4.1.4.
2. Index Page IX will be revised to be consistent with the proposed changes to current TSs 3.9.8.1 and 3.9.8.2.



The staff has reviewed the proposed changes and finds them acceptable because they are non-technical changes for consistency.

## 2.2 TS 3.0.3 Limiting Condition for Operation and Surveillance Requirements

The sentence "This specification is not applicable in MODES 5 or 6" will be added to TS 3.0.3. The staff has reviewed the proposed change and finds it acceptable because the action requirements of individual specifications define the remedial measures to be taken. In addition, this change will provide clarification concerning the applicability of the shutdown requirements of TS 3.0.3 when the plant is in MODES 5 or 6.

## 2.3 TS 3.4.1.1 Reactor Coolant System - Coolant Loops and Coolant Recirculation, Startup and Power Operation

1. The word "Both" will be replaced with "Two" in the Limiting Condition For Operation (LCO).

This is a non-technical change for consistency between related TSs. The staff has reviewed the proposed change and finds it acceptable.

2. The phrase "and both reactor coolant pumps in each loop" will be removed from the LCO and relocated to the TS Bases.

The staff finds this change acceptable because plant operation in Modes 1 (Power Operation) and 2 (Startup) requires all four RCPs to be in operation. In addition, if all four RCPs are not in operation, the Reactor Protection System will initiate a reactor trip, placing the plant in Mode 3 (Hot Standby).

3. The words "OPERABLE and" will be added to the LCO.

This change is more restrictive because it ensures that the RCS loops must be operable, in addition to operating, to satisfy the LCO. The staff has reviewed the proposed change and finds it acceptable.

4. The action statement will be modified by replacing "less than the above required reactor coolant pumps in operation" with "the requirements of the above specification not met" to be consistent with the proposed changes to the LCO.

This is a non-technical change for consistency between the LCO and action statement. The staff has reviewed the proposed change and finds it acceptable.

5. The action statement time requirement to be in Hot Standby in 1 hour will be changed to 6 hours.

The current requirement to be in Hot Standby in 1 hour only applies if less than all four RCPs are in operation. If this situation occurs, the Reactor Protection System will initiate a reactor trip, thus placing the plant in Hot Standby. The staff has reviewed the proposed change and finds it acceptable because the increase to 6 hours will provide sufficient time to accomplish a controlled shutdown should a situation occur with the plant at full power, where all RCPs remain in operation, but the RCS loops are declared inoperable.

6. The phrase "and circulating reactor coolant" will be removed from Surveillance Requirement (SR) 4.4.1.1.

The staff has reviewed the proposed change and finds it acceptable because an RCS loop that is in operation, is circulating reactor coolant. Therefore, it is not necessary to include this phrase to ensure compliance with this TS.

In addition, the proposed changes to TS 3.4.1.1 are consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, April 1995.

#### 2.4 TS 3.4.1.2 Reactor Coolant System - Coolant Loops and Coolant Recirculation, Hot Standby

1. LCOs a and b will be combined into one. The word "Two" will be added to the LCO. The format for "Reactor Coolant Loops" will be changed such that the first letter of each word will be lowercase. A period will also be added at the end of the LCO.

The staff has reviewed the proposed changes and finds them acceptable because they are non-technical changes for consistency between related TSs.

2. The phrases "Reactor Coolant Loop A and at least one associated reactor coolant pump" and "Reactor Coolant Loop B and at least one associated reactor coolant pump" will be removed from the LCO.

This information is being relocated to the TS Bases. The TS Bases are an appropriate location for detailed descriptions of system design. The staff has reviewed the proposed change and finds it acceptable because they do not result in any substantive change in the operating requirements.

3. The footnote (\*) will be modified by replacing the phrase "be de-energized" with "not be in operation," replacing "dilution" with "reduction," and capitalizing the first letters of "Reactor Coolant System."

These are non-technical changes to eliminate any confusion on how to comply with the term de-energized, and to provide a consistent editorial format. In addition, the format of the footnote will be changed and the footnote will be moved to between the LCO and the Applicability. This format change, which is non-technical, will eliminate any potential confusion when multiple footnotes apply to a specification. The staff has reviewed the proposed changes and finds them acceptable.

4. The footnote (\*) will be modified by adding the phrase "per 8 hour period" to the 1-hour time period that the RCPs may be secured.

The staff has reviewed the proposed change and finds it acceptable because this is a more restrictive change that will limit how often the RCPs can be secured during an 8-hour period.

5. The applicability of this specification will not change, however a period will be added after Mode 3. This is a non-technical change for format consistency and is, therefore, acceptable.
6. Action Statement a will be modified to only address one inoperable reactor coolant loop. Two inoperable reactor coolant loops will be addressed by the proposed change to Action Statement b. Minor wording changes will also be made to be consistent with the proposed change in scope of this action statement.
7. Action Statement b will be expanded to address two inoperable reactor coolant loops. Action Statement b will also be modified to require immediate action instead of within 1 hour. Requiring immediate action to restore one reactor coolant loop to operable status and operation is a conservative change.

These changes described in paragraphs 6 and 7, result in action statements that encompass all combinations of inoperable equipment. This will ensure the proper action statement is used by plant operators to address this situation. The staff has reviewed the proposed changes and finds them acceptable.

8. SR 4.4.1.2.1 will be modified by changing the phrase "At least the above required reactor coolant pumps" to "The required reactor coolant pump." In addition, "alignments" will be changed to "alignment" and "availability" to "available." These are non-technical changes to provide consistency and clarification between related TSs and are consistent with the proposed changes to the LCO. The staff has reviewed the proposed changes and finds them acceptable
9. SR 4.4.1.2.2 will be modified by changing the phrase "At least one cooling loop" to "One reactor coolant loop." This is a non-technical change to provide consistency between related TSs and is consistent with the proposed changes to the LCO. The staff has reviewed the proposed change and finds it acceptable.
10. The phrase "and circulating reactor coolant" will be removed from SR 4.4.1.2.2. An RCS loop that is in operation is circulating reactor coolant.

The staff has reviewed the proposed change and finds it acceptable because an RCS loop that is in operation, is circulating reactor coolant. Therefore, it is not necessary to include this phrase to ensure compliance with this TS.

11. SR 4.4.1.2.3 will be added. An operable RCS loop requires an operable SG with sufficient secondary water level. The staff has reviewed the proposed change and finds it acceptable because the addition of this SR is a more restrictive change which will provide a requirement for periodic verification of adequate secondary SG water level.

In addition, the proposed changes to TS 3.4.1.2 are consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, April 1995.

2.5 TS 3.4.1.3 Reactor Coolant System - Coolant Loops and Coolant Recirculation, Hot Shutdown

1. This TS, which currently addresses Modes 4 and 5 will be divided into 3 separate TSs; 3.4.1.3 - Hot Shutdown; 3.4.1.4 - Cold Shutdown - RCS Loops Filled; and 3.4.1.5 - Cold Shutdown - RCS Loops Not Filled. As a result, the title of this specification will be changed to "HOT SHUTDOWN." This is a non-technical change associated with formatting of the TSs. The staff has reviewed the proposed change and finds it acceptable.
2. The structure of the LCO will be changed to be consistent with TSs 3.4.1.1 and 3.4.1.2. The term "loop" will be used to refer to the RCS, and the term "train" will be used to refer to the Shutdown Cooling (SDC) System. The phrases "Reactor Coolant Loop A and its associated SG and at least one associated reactor coolant pump" and "Reactor Coolant Loop B and its associated SG and at least one associated reactor coolant pump" will be removed from the LCO. The requirement to maintain two operable loops or trains for heat removal, with one loop or train in operation, will not change.

This information is being relocated to the TS Bases. The TS Bases are an appropriate location for detailed descriptions of system design. The staff has reviewed the proposed change and finds it acceptable because it does not result in any substantive change in the operating requirements.

3. The first footnote (#) will be deleted. This footnote, which is only applicable in Mode 5, is no longer necessary based on the proposed change to limit this specification to Mode 4. This is a non-technical change associated with formatting of the TSs and is acceptable.
4. The second footnote (\*) will be modified by replacing the phrase "be de-energized" with "not be in operation," replacing "dilution" with "reduction," and capitalizing the first letters of "Reactor Coolant System." The staff has reviewed the proposed changes and finds them acceptable because these are non-technical changes to eliminate any confusion on how to comply with the term de-energized, and to provide a consistent editorial format.
5. The second footnote (\*) will be modified by adding the phrase "per 8 hour period" to the 1-hour time period that the RCPs and SDC pumps may be secured. The staff has reviewed the proposed change and finds it acceptable because this is a more restrictive change that limits how often these pumps can be secured.
6. The format of the second (\*) and third (\*\*) footnotes will be changed and the footnotes will be moved to between the LCO and the Applicability. This format change, which is non-technical, will eliminate any potential confusion when multiple footnotes apply to a specification. The staff has reviewed the proposed changes and finds them acceptable.
7. The Mode of Applicability for this specification will be reduced to just Mode 4. Mode 5 requirements will be addressed by proposed TSs 3.4.1.4 and 3.4.1.5. The licensee's proposal only involves the change of the TS format. The staff has reviewed the proposed changes and finds that they are acceptable.

8. The action requirements will be expanded and modified to address various combinations of inoperable equipment.
  - a. If one RCS loop and two SDC trains are inoperable, the proposed action statement will require immediate action, instead of the current time requirement of 1 hour, to restore a second RCS loop or one SDC train to operable status. The proposed change from 1 hour to immediate is more conservative. In addition, the proposed action requirement will no longer require a cooldown to Mode 5 if no SDC trains are operable. The staff has reviewed the proposed changes and finds them acceptable because it is not appropriate to require a cooldown to Mode 5 with no operable SDC trains for proper decay heat removal. Also, the change of action time from 1 hour to immediate is more restrictive.
  - b. If two RCS loops and one SDC train are inoperable, the proposed action statement will require immediate action, instead of the current time requirement of 1 hour, to restore one RCS loop or a second SDC train to operable status. The staff has reviewed the proposed change and finds it acceptable since the proposed change of action time from 1 hour to immediate is more restrictive.

The current action requirement also requires a cooldown to Mode 5 within 20 hours. The cooldown to Mode 5 requirement will be retained. However, the proposed action time requirement will be increased to 24 hours to be consistent with the time requirement to reach Mode 5 contained in most TSs, including TS 3.0.3. The staff has reviewed the proposed change and finds it acceptable because the change of cooldown time from 20 hours to 24 hours will not significantly affect safe operation of the reactor. It is appropriate to have the required cooldown time consistent with that in other Millstone Unit 2 TSs.

- c. If all RCS loops and SDC trains are inoperable, or no RCS loop or SDC train is in operation, the proposed action statement will require immediate suspension of all activities involving a reduction in RCS boron concentration and immediate action to restore one RCS loop or SDC train to operable status and operation. This is consistent with the current required action if no RCS loop or SDC train is in operation. However, the time requirement has been changed to immediate from the current requirement of 1 hour. The staff has reviewed the proposed change and finds it acceptable since the proposed change from 1 hour to immediate is more restrictive.

In addition, this proposed action will now address the inoperability of all RCS loops and SDC trains. This situation is currently addressed in Action Statement a, which would require a plant cooldown to Mode 5. However, the proposed action requirement will not require a cooldown to Mode 5 since no SDC trains are operable. The staff has reviewed the proposed change and finds it acceptable since it is not appropriate to require a cooldown to Mode 5 with no operable SDC trains for decay heat removal.

9. SR 4.4.1.3.1 will be modified by replacing the phrase "shutdown cooling loop(s)" with "pump." This will allow this SR to apply to either the RCP or the SDC pump that is not in operation, but that is being used to satisfy the LCO. The phrase "for pump and shutdown cooling loop valves" will be deleted. The verification of power to the SDC valves will still be performed as necessary to ensure that the required SDC train not in operation is operable. The Bases for this specification will be modified to include the component requirements for

an SDC train to be considered operable. In addition, "availability" will be changed to "available." The staff has reviewed the proposed changes and finds the proposed SR acceptable because these changes will provide consistency between related TSs and are consistent with the proposed changes to the LCO.

10. SR 4.4.1.3.2 will be deleted. The proposed change to SR 4.4.1.3.1 will include the requirements of this SR. Therefore, this duplicate SR can be deleted. The staff has reviewed the proposed change and finds it acceptable.
11. SRs 4.4.1.3.3 and 4.4.1.3.4 will be renumbered as 4.4.1.3.2 and 4.4.1.3.3, respectively, as a result of the deletion of the current SR 4.4.1.3.2. The staff has reviewed the proposed changes and find that they are acceptable because these changes are editorial in nature.
12. The proposed SR 4.4.1.3.2 will be modified by removing the phrase "if it is being used to meet 3.4.1.3.a." It is not necessary to include this additional information since the SR already contains the word "required." Therefore, this SR would only apply if the reactor coolant loops and associated SGs are being used to satisfy the LCO requirements. The staff has reviewed the proposed change and finds it acceptable because it is a non-technical change, consistent with the proposed changes to the LCO.
13. The proposed SR 4.4.1.3.2 will also be modified by replacing the phrase "10% of span" with "10% narrow range." The change in terminology will reflect the instrumentation currently used to verify compliance with this SR. The plant operators have two types of indication for SG secondary water inventory, wide range and narrow range. The wide range indication reads out in inches, and the narrow range indication reads out in percent. The narrow range indication is used to verify compliance with this SR. Since 10% of span is equivalent to 10% narrow range, this change will eliminate any ambiguity with respect to the proper instrumentation to use. There will be no technical change to the required secondary water volume for SG operability. The staff has reviewed the proposed change and finds it acceptable because the proposed change will clearly state the instrument used in the TS to avoid confusion.
14. The proposed SR 4.4.1.3.3 will be modified by changing the phrase "At least one coolant loop" to "One reactor coolant loop or shutdown cooling train." The staff has reviewed the proposed change and finds it acceptable because it is a non-technical change to provide consistency between related TSs and is consistent with the proposed changes to the LCO.
15. The phrase "and circulating reactor coolant" will be removed from SR 4.4.1.3.3. An RCS loop or SDC train that is in operation is circulating reactor coolant. It is not necessary to include this phrase to ensure compliance with this TS. The staff has reviewed the proposed change and finds it acceptable since this is a non-technical change.
16. Amendment No. 69 will be added to the bottom of page 3/4 4-1c. This page was previously changed by License Amendment No. 69, dated May 19, 1981. The staff has reviewed the proposed change and finds this editorial change acceptable.

In addition, the proposed changes to TS 3.4.1.3 are consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, April 1995.

## 2.6 TS 3.4.1.4 Cold Shutdown - Reactor Coolant System Loops Filled

1. The proposed TS 3.4.1.4 will address the Mode 5 requirements currently contained in TS 3.4.1.3. However, this new specification will only address Mode 5 requirements when the RCS loops are filled. As a result, the title of this specification will be changed to "COLD SHUTDOWN - REACTOR COOLANT SYSTEM LOOPS FILLED." The staff has reviewed the proposed change and finds it acceptable since this is a non-technical change.
2. The LCO will be changed to require at least one SDC train to be operable and in operation. A second heat removal path is also required to be operable. This second heat removal path can be either the second SDC train, or both SGs, provided sufficient secondary water volume exists. The proposed LCO will no longer require the associated RCPs to be operable. However, both SGs will be required to have sufficient secondary water level to support natural circulation before they can satisfy the LCO requirement for a second heat removal path. The requirement to maintain two flow paths for heat removal, with one train in operation, will not change.

The proposed TS 3.4.1.4 would allow both SGs to be an acceptable substitute for a second SDC train. If the second SDC train was not available, and the remaining SDC train became unavailable for decay heat removal, the SGs would be able to remove RCS decay heat by natural circulation. Heat could then be removed from the SGs by steaming the water inventory inside the SGs in Mode 5 for a limited time period. However, this is not a normal method of heat removal from the steam generators, and this approach would be difficult to support for an extended time period. Therefore, if at least one SDC train could not be restored to operation, it is likely the plant would heat up to Mode 4 where TS 3.4.1.3 applicable to Mode 4 becomes applicable. Under these conditions the use of an SG for decay heat removal becomes effective due to a higher RCS temperature. While a Mode transition may occur, the operability of the steam generators will ensure the safety function is maintained. The staff has reviewed the proposed changes and finds them acceptable.

3. The format of the footnotes will be changed, and the footnotes will be moved to between the LCO and the Applicability. The staff has reviewed the proposed change and finds it acceptable because this format change, which is non-technical, will eliminate any potential confusion when multiple footnotes apply to a specification.
4. The second footnote (\*) will be modified to remove the phrase "reactor coolant pumps and." This change is consistent with the proposed changes to the LCO which no longer place any requirement on RCP operation. In addition, this footnote will also be modified by replacing the phrase "be de-energized" with "not be in operation," replacing "dilution" with "reduction," and capitalizing the first letters of "Reactor Coolant System." The staff has reviewed the proposed changes and finds them acceptable because they are non-technical changes to eliminate any confusion on how to comply with the term de-energized, and to provide a consistent editorial format.
5. The second footnote (\*) will be modified by adding the phrase "per 8 hour period" to the 1-hour time period that the SDC pumps may be secured. The staff has reviewed the proposed change and finds it acceptable since it is a more restrictive change that limits how often these pumps can be secured.

6. Two additional notes will be added. The fourth note will allow one SDC train to be inoperable for up to 2 hours for surveillance testing. This is necessary to allow performance of required testing when the LCO requires both SDC trains to be operable. The staff has reviewed the proposed change and finds it acceptable since allowing a short time outage of one SDC train for the necessary surveillance testing will not significantly affect safe plant operation.

The fifth note will provide for an orderly transition from Mode 5 to Mode 4 during a planned heatup by permitting the SDC trains to not be in operation when at least one reactor coolant loop is in operation. This allows the required RCS circulation from an SDC train to be replaced by RCS circulation from an RCP. The staff has reviewed the proposed change and finds it acceptable since under this plant operation condition, the function of decay heat removal via SDC train is being replaced by SGs.

7. The Mode of Applicability for this specification will be reduced to Mode 5, with the RCS loops filled. Mode 4 requirements will be addressed by the proposed TS 3.4.1.3. Mode 5 requirements when the RCS loops are not filled will be addressed by the proposed TS 3.4.1.5. The Bases will be modified to discuss the requirements for the RCS with its loop filled. The staff has reviewed the proposed changes and finds them acceptable since these only involve the changes of the TSs format.
8. The action requirements will be modified to be consistent with the proposed changes to the LCO.
  - a. If one SDC train is inoperable, and any SG does not have sufficient secondary water level, the proposed action statement will require immediate action, instead of the current time requirement of 1 hour, to restore a second SDC train or both SGs to operable status. The proposed change from 1 hour to immediate is conservative. In addition, the proposed action requirement will no longer require a cooldown to Mode 5 since the proposed specification is only applicable when the plant is in Mode 5. The staff has reviewed the proposed change and finds it acceptable since the change of action time from 1 hour to immediate action is more restrictive.
  - b. If all SDC trains are inoperable, or no SDC train is in operation, the proposed action statement will require an immediate suspension of any activity that would reduce the RCS boron concentration and immediate action to restore one SDC train to operable status and operation. This is consistent with the current required action if no RCS loop or SDC train is in operation. However, the time requirement has been changed to immediate from the current requirement of 1 hour. The proposed change from 1 hour to immediate is conservative. This is an additional action requirement for the situation when all SDC trains are inoperable. The staff has reviewed the proposed changes and finds them acceptable since they are either consistent with the current TS or more restrictive requirements.
9. The current SR 4.4.1.3.1 will be renumbered as SR 4.4.1.4.1, and it will be modified by replacing the word "loop(s)" with "pump." The phrase "for pump and shutdown cooling loop valves" will be deleted. In addition, "availability" will be changed to "available." These



changes will provide consistency between related TSs and are consistent with the proposed changes to the LCO. The staff has reviewed the proposed changes and finds them acceptable.

10. SR 4.4.1.3.2 will be deleted. The proposed changes to the LCO no longer address RCP operation. The staff has reviewed the proposed change and finds it acceptable since this is consistent with the change of LCO.
11. SRs 4.4.1.3.3 and 4.4.1.3.4 will be renumbered as 4.4.1.4.2 and 4.4.1.4.3, respectively, as a result of the proposed changes to the LCO and the deletion of the current SR 4.4.1.3.2. This is an editorial change. The staff has reviewed the proposed change and finds it acceptable.
12. The proposed SR 4.4.1.4.2 will be modified by removing the parentheses from "generator(s)." The proposed LCO will require both SGs to be operable to be an acceptable substitute for an SDC train. In addition, the phrase "if it is being used to meet 3.4.1.3.a" will be removed. It is not necessary to include this additional information since the SR already contains the word "required." Therefore, this SR would only apply if the SGs are being used to satisfy the LCO requirements. The staff has reviewed the proposed changes and finds that they are acceptable because these are non-technical changes, consistent with the proposed changes to the LCO.
13. The proposed SR 4.4.1.4.2 will also be modified by replacing the phrase "10% of span" with "10% narrow range." The change in terminology will reflect the instrumentation currently used to verify compliance with this SR. The plant operators have two types of indication for steam generator secondary water inventory, wide range and narrow range. The wide range indication reads out in inches, and the narrow range indication reads out in percent. The narrow range indication is used to verify compliance with this SR. The staff has reviewed the proposed changes and finds them acceptable since 10% of span is equivalent to 10% narrow range. This change will eliminate any ambiguity with respect to the proper instrumentation to use. There will be no technical change to the required secondary water volume for SG operability.
14. The proposed SR 4.4.1.4.3 will be modified by changing the phrase "At least one coolant loop" to "One shutdown cooling train." The staff has reviewed the proposed change and finds it acceptable because this is a non-technical change to provide consistency between related TSs and is consistent with the proposed changes to the LCO.
15. The phrase "and circulating reactor coolant" will be removed from SR 4.4.1.4.3. An SDC train that is in operation is circulating reactor coolant. It is not necessary to include this phrase to ensure compliance with this TS. This is a non-technical change. The staff has reviewed the proposed change and finds it acceptable.

In addition, the proposed changes to TS 3.4.1.4 are consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, April 1995.

## 2.7 TS 3.4.1.5 Cold Shutdown - Reactor Coolant System Loops Not Filled

1. The proposed TS 3.4.1.5 will address the Mode 5 requirements currently contained in TS 3.4.1.3. However, this new specification will only address Mode 5 requirements when the RCS loops are not filled. As a result, the title of this specification will be changed to "COLD SHUTDOWN - REACTOR COOLANT SYSTEM LOOPS NOT FILLED." The staff has reviewed the proposed change and finds it acceptable since this is a non-technical change.
2. The LCO will be changed to require two SDC trains to be operable, and at least one SDC train to be in operation. The proposed LCO will no longer take credit for the RCS loops since the applicability of this specification is limited to when the RCS loops are not filled. The requirement to maintain two flow paths for heat removal with one train in operation will not change. The staff has reviewed the proposed change and finds it acceptable since RCS loop could not serve the function of decay heat removal with its loop not filled.
3. The format of the footnotes will be changed, and the footnotes will be moved to between the LCO and the Applicability. The staff has reviewed the proposed change and finds it acceptable because this format change, which is non-technical, will eliminate any potential confusion when multiple footnotes apply to a specification.
4. The second footnote (\*) will be modified as follows.
  - a. The phrase "reactor coolant pumps and" will be removed. The staff has reviewed the proposed change and finds it acceptable because this change is consistent with the proposed changes to the LCO which no longer places any requirement on RCP operation.
  - b. The phrase "be de-energized" will be replaced with "not be in operation," the word "dilution" will be replaced with "reduction," and the first letters of "Reactor Coolant System" will be capitalized. The staff has reviewed the proposed change and finds it acceptable because these are non-technical changes to eliminate any confusion on how to comply with the term de-energized and for consistency between footnotes.
  - c. The time that all SDC pumps can be secured will be reduced from 1 hour to 15 minutes, and this will only be allowed when switching from one SDC train to the other. An additional limitation will be added to prohibit draining operations that would reduce the RCS volume when switching the operating SDC train. These are more conservative changes to this footnote. The staff has reviewed the proposed changes and finds that they are more restrictive and therefore, acceptable.
5. A fourth note will be added to allow one SDC train to be inoperable for up to 2 hours for surveillance testing. This is necessary to allow performance of required testing when the LCO requires both SDC trains to be operable. The staff has reviewed the proposed change and finds it acceptable since allowing a short outage time for one SDC train when performing the necessary surveillance testing will not significantly affect safe plant operation.

6. The Mode of Applicability for this specification will be reduced to Mode 5, when the RCS loops are not filled. Mode 4 requirements will be addressed by proposed TS 3.4.1.3. Mode 5 requirements when the RCS loops are filled will be addressed by proposed TS 3.4.1.4. The Bases will be modified to discuss the requirements for the RCS with its loop filled. The staff has reviewed the proposed changes and find that they are acceptable since these only involve changes of TS format.
7. The action requirements will be modified to be consistent with the proposed changes to the LCO.
  - a. If one SDC train is inoperable the proposed action statement will require immediate action, instead of the current time requirement of 1 hour, to restore an SDC train to operable status. The proposed change from 1 hour to immediate is conservative. In addition, the proposed action requirement will no longer require a cooldown to Mode 5 since the proposed specification is only applicable when the plant is in Mode 5. The staff has reviewed the proposed change and finds it acceptable since the change of action time from 1 hour to immediate action is more restrictive.
  - b. If all SDC trains are inoperable, or no SDC train is in operation, the proposed action statement will require an immediate suspension of any activity that would reduce the RCS boron concentration and immediate action to restore one SDC train to operable status and operation. This is consistent with the current required action if no RCS loop or SDC train is in operation. However, the time requirement has been changed to immediate from the current requirement of 1 hour. The proposed change from 1 hour to immediate is conservative. This is an additional action statement requirement if all SDC trains are inoperable. The staff has reviewed the proposed changes and finds them acceptable since they are consistent with the current TS and provide more restrictive requirements.
8. The current SR 4.4.1.3.1 will be renumbered as SR 4.4.1.5.1, and will be modified by replacing the word "loop(s)" with "pump." The phrase "for pump and shutdown cooling loop valves" will be deleted. In addition, "availability" will be changed to "available." The staff has reviewed the proposed changes and finds them acceptable because they will provide consistency between related TSs and are consistent with the proposed changes to the LCO.
9. SRs 4.4.1.3.2 and 4.4.1.3.3 will be deleted. The proposed changes to the LCO no longer place any requirement on RCP or SG operation. The staff has reviewed the proposed change and finds it acceptable since this is consistent with the change of LCO.
10. SR 4.4.1.3.4 will be renumbered as 4.4.1.5.2 as a result of the proposed changes to the LCO and the deletion of the current SRs 4.4.1.3.2 and 4.4.1.3.3. This is an editorial change. The staff has reviewed the proposed change and finds it acceptable.
11. The proposed SR 4.4.1.5.2 will be modified by changing the phrase "At least one coolant loop" to "One shutdown cooling train." The staff has reviewed the proposed change and finds it acceptable because it is a non-technical change to provide consistency between related TSs and is consistent with the proposed changes to the LCO.

12. The phrase "and circulating reactor coolant" will be removed from SR 4.4.1.5.2. The staff has reviewed the proposed change and finds it acceptable because an SDC train that is in operation is circulating reactor coolant. It is not necessary to include this phrase to ensure compliance with this TS.

In addition, the proposed changes to TS 3.4.1.5 are consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, April 1995.

#### 2.8 TS 3.4.1.6 Cold Shutdown

1. The current TS 3.4.1.4 will be renumbered as 3.4.1.6. This is a result of the addition of two new TSs to address Mode 5 conditions. In addition, the title will be changed to "COLD SHUTDOWN" to be consistent with the format for TSs 3.4.1.1 through 3.4.1.5. These are non-technical changes. The staff has reviewed the proposed changes and finds them acceptable.
2. The reference to the LCO number in the associated Action Statement will be changed to 3.4.1.6. The staff has reviewed the proposed change and finds it acceptable because this is a non-technical change to be consistent with the proposed change to the LCO.
3. The SR will be renumbered as 4.4.1.6. The staff has reviewed the proposed change and finds it acceptable because this is a non-technical change to be consistent with the proposed change to the LCO.
4. The page number for this specification will be changed to 3/4 4-1h. This is a non-technical change. The staff has reviewed the proposed change and finds it acceptable.

#### 2.9 TS 3.9.8.1 Shutdown Cooling and Coolant Circulation - High Water Level

1. The proposed TS 3.9.8.1 will address the SDC System requirements when the plant is in Mode 6 with the refueling cavity filled to a water level of at least 23 feet above the reactor vessel flange. This specification will combine the requirements currently contained in TSs 3.9.8.1 and 3.9.8.2. As a result, the title of this specification will be changed to "SHUTDOWN COOLING AND COOLANT CIRCULATION - HIGH WATER LEVEL." This is a non-technical change. The staff has reviewed the proposed change and finds it acceptable.
2. The LCO will be changed to require, as a minimum, one SDC train to be operable and in operation. The additional requirement for the SDC train to be operable is a more restrictive change. A second heat removal method will not be specified in the LCO. However, a second heat removal method will be available since the large volume of water above the reactor vessel flange is capable of providing a sufficient heat sink for core decay heat removal. In addition, the word "loop" will be replaced with "train" to be consistent with the terminology used when referring to the SDC System. The staff has reviewed the proposed changes and finds them acceptable since the proposed TS is consistent with the other TS and is more restrictive.
3. The format of the footnotes will be changed, and the footnotes will be moved to between the LCO and the Applicability. The staff has reviewed the proposed change and finds it

acceptable because this format change, which is non-technical, will eliminate any potential confusion when multiple footnotes apply to a specification.

4. The first footnote (\*) will be modified as follows.
  - a. The phrase "The shutdown cooling loop" will be replaced with "The required shutdown cooling train." The staff has reviewed the proposed change and finds it acceptable since this change is consistent with the proposed changes to the LCO.
  - b. The phrase "be removed from" will be replaced with "not be in." The staff has reviewed the proposed change and finds it acceptable because this is a non-technical change to be consistent with the wording of similar notes contained in TSs 3.4.1.2 through 3.4.1.5.
  - c. The phrase "during the performance of CORE ALTERATIONS in the vicinity of the reactor pressure vessel hot legs" will be replaced with "provided no operations are permitted that would cause a reduction in Reactor Coolant System boron concentration." The staff has reviewed the proposed change and finds it acceptable because in addition to the removal of decay heat, the requirement to maintain an SDC train in operation ensures sufficient time exists for the plant operators to recognize an inadvertent dilution. Therefore, it is appropriate to prohibit operations that may reduce the RCS boron concentration when securing SDC flow. It is not necessary to restrict the time when SDC flow can be secured to just when performing core alterations in the vicinity of the hot legs. Adequate heat removal is provided by the volume of water in the refueling cavity, and the time restriction of 1 hour per 8-hour period will ensure the RCS temperature increase is not significant.
5. The second footnote (\*\*) will be modified by replacing the word "each" with "the required" and the word "loop" with "train." The staff has reviewed the proposed change and finds it acceptable since these changes are consistent with the proposed changes to the LCO.
6. A third note will be added to allow the SDC pumps to be removed from operation to perform local leak rate testing of the SDC suction line containment penetration (penetration number 10), and to perform maintenance on valves located in this common SDC suction line.

This provision is being added to allow performance of work (local leak rate testing) that is currently performed during plant heatup after SDC has been removed from service. It will also allow the performance of work on the valves located in the common SDC suction line. Both SDC trains at Millstone Unit 2 share a common suction line from the RCS. Therefore, if work is required on the valves in this line it may be necessary to secure SDC flow and isolate this line. If this work can't be performed within the 1-hour constraint currently allowed by the first note, it would be necessary to completely defuel the reactor. However, if the work can be safely performed within a time period established by evaluating plant conditions (e.g., decay heat load), it may be more appropriate to leave the fuel in the reactor vessel. The addition of this note will provide flexibility to evaluate various options and determine the appropriate approach to perform the required work.

In addition to the requirement to suspend operations that would reduce RCS boron concentration as specified in the first note, core alterations will not be allowed and containment penetrations must be configured to prevent a release of radioactivity from the containment atmosphere to use this provision.

The staff has reviewed the licensee's assessment and finds the proposed changes acceptable because there are sufficient restrictions provided when the SDC pumps are removed from operation in order to perform local leak rate testing of the SDC suction line and to perform maintenance on valves located in the common suction line. Therefore, the proposed TS will not significantly affect safe plant operation.

7. The Mode of Applicability for this specification will be reduced to Mode 6 with the refueling cavity filled to a water level of at least 23 feet above the reactor vessel flange. This is a more restrictive change since it will provide additional plant requirements before only one SDC train will be required to be operable and in operation. The staff has reviewed the proposed change and finds it acceptable since the proposed change is more conservative.
8. The action requirements will be modified by requiring the suspension of activities to load irradiated fuel assemblies in the core, instead of requiring the suspension of activities that would increase the reactor decay heat load. However, this will not result in a technical change to the action requirements since the only way to increase the reactor decay heat load is by loading irradiated fuel assemblies in the core. In addition, an immediate time requirement will be added. The current action statement does not specify a time requirement for the suspension of this activity, or of activities that may reduce RCS boron concentration. The staff has reviewed the proposed change and finds it acceptable since this proposed change is more conservative.
9. The action requirements will also be expanded to specify the containment penetrations and required status. The staff has reviewed the proposed change and finds it acceptable since this additional detail will provide added assurance that the action requirement will be met. In addition, there is no technical change to the requirement to secure the containment penetrations providing direct access from the containment atmosphere to the outside atmosphere.
10. The statement that the provisions of Specification 3.0.3 are not applicable for 3.9.8.1 and 3.9.8.2 will be removed. The staff has reviewed the proposed change and finds it acceptable since the shutdown requirements of TS 3.0.3 do not apply in Modes 5 and 6. This is specified in the current Bases for TS 3.0.3, and is consistent with the proposed change to TS 3.0.3 previously discussed.
11. The current SR 4.9.8.1 will be modified by replacing the phrase "At least one shutdown cooling loop" with "One shutdown cooling train." The staff has reviewed the proposed change and finds it acceptable because it will provide consistency between related TSs and is consistent with the proposed changes to the LCO.
12. The phrase "and consistent with decay heat requirements" will be removed from SR 4.9.8.1. The staff has reviewed the proposed change and finds it acceptable because SDC flow will be adjusted by the plant operators, within the flow requirements of this SR, as necessary to ensure sufficient decay heat removal.

13. SR 4.9.8.2 will be deleted. As a result of the proposed changes to the LCO and to the applicability of this specification, it is no longer necessary to verify a second SDC train is available, or that sufficient water volume is available to add to the refueling cavity. If sufficient water level is not maintained above the reactor vessel flange, this specification will not apply. The verification of the second SDC train will be retained in the proposed TS 3.9.8.2. The staff has reviewed the proposed change and finds it acceptable since the proposed change is consistent with the changes to the LCO.
14. The amendment number on page 3/4 9-8a will be changed from 69 to 71. This page was initially issued by License Amendment No. 71. The staff has reviewed the proposed change and finds this editorial change acceptable.

In addition, the proposed changes to TS 3.9.8.1, with the exception of the addition of the third note discussed in item number 6, are consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, April 1995.

#### 2.10 TS 3.9.8.2 Shutdown Cooling and Coolant Circulation - Low Water Level

The current structure of TS 3.9.8.2 was the result of a change requested by NNECO in a letter dated December 2, 1981, and approved by the NRC as License Amendment No. 71. The change was requested to provide operational flexibility in the performance of leak testing of certain containment isolation valves associated with the Reactor Building Closed Cooling Water (RBCCW) System. Since this flexibility is no longer necessary, the proposed changes described below will restore TS 3.9.8.2 to a format consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1 April 1995.

1. The proposed TS 3.9.8.2 will address the SDC System requirements when the plant is in Mode 6 and the refueling cavity is not filled to a water level of at least 23 feet above the reactor vessel flange. This specification will combine the requirements currently contained in TSs 3.9.8.1 and 3.9.8.2. As a result, the title of this specification will be changed to "SHUTDOWN COOLING AND COOLANT CIRCULATION - LOW WATER LEVEL." The staff has reviewed the proposed change and finds it acceptable since this is a non-technical change.
2. The LCO will be changed to require two SDC trains to be operable and one SDC train to be in operation. The staff has reviewed the proposed change and finds it acceptable since the additional requirement for one SDC train to be in operation is already required by the current TS 3.9.8.1. Therefore, the additional requirement for an SDC train to be operable is more conservative.

The word "independent" will be removed. The level of independence between the SDC trains is a design feature of the SDC System. The staff has reviewed the proposed change and finds it acceptable because it is not necessary to include a check of the SDC train independence in the TSs. The Millstone Unit 2 Final Safety Analysis Report (FSAR) describes the approved level of independence between SDC trains. If the approved level of independence is not maintained, the SDC trains may not be operable.

The word “loops” will be replaced with “trains” to be consistent with the terminology used when referring to the SDC System. The staff has reviewed the proposed change and finds it acceptable since this is a non-technical change.

3. The first footnote (\*) will be deleted since this footnote is no longer necessary. There are no expected plant operations that would require all SDC flow to be secured before at least 23 feet of water is established above the reactor vessel flange. The staff has reviewed the proposed change and finds it acceptable since this is a more restrictive change.
4. The format for the second footnote (\*\*) will be changed, and the footnote will be moved to between the LCO and the Applicability. This format change, which is non-technical, will eliminate any potential confusion when multiple footnotes apply to a specification.

The word “loop” will be replaced with “train” to be consistent with the terminology used when referring to the SDC System. The staff has reviewed the proposed changes and finds them acceptable because they are non-technical changes which provide consistency associated with SDC system terminology.

5. The Mode of Applicability for this specification will be changed such that to relax the requirement for two operable SDC trains, the refueling cavity must be filled to a water level of at least 23 feet above the reactor vessel flange. The staff has reviewed the proposed change and finds it acceptable since this is a more restrictive change.
6. The action requirements will be modified to be consistent with the proposed changes to the LCO.
  - a. If one SDC train is inoperable, the proposed action statement will require immediate action, instead of the current time requirement of 1 hour, to restore the SDC train to operable status. The proposed change from 1 hour to immediate is conservative. In addition, the proposed action requirement will provide an additional action that can be taken. This new action will be to immediately initiate action to establish  $\geq 23$  feet of water above the reactor vessel flange. If at least 23 feet of water is established above the reactor vessel flange, this TS will no longer be applicable. Therefore, this proposed additional action is appropriate and is consistent with the proposed changes to this specification. The staff has reviewed the proposed changes and finds them acceptable since these proposed changes are either consistent with the proposed LCO or more restrictive.
  - b. If all SDC trains are inoperable, or no SDC train is in operation, the proposed action statement will require an immediate suspension of any activity that would reduce the RCS boron concentration. This is consistent with the action requirement associated with the current TS 3.9.8.1. However, the proposed action statement will require immediate action, instead of the current time requirement of 1 hour, to restore an SDC train to operable status and operation. The proposed change from 1 hour to immediate is conservative.



In addition, this proposed action requirement will not require the suspension of activities that would increase the reactor decay heat load. This is appropriate since the only way to increase the reactor decay heat load is by loading irradiated fuel assemblies in the core, but fuel movement is not allowed unless at least 23 feet of water exists above the reactor vessel flange (TS 3.9.11, "Refueling Operations - Water Level - Reactor Vessel"). Therefore, it is not necessary to require the suspension of activities that could increase decay heat load in this specification. The staff has reviewed the proposed changes and find them acceptable because they are either consistent with the action statement associated with the current TS 3.9.8.1, or more restrictive.

- c. The action requirements will also be expanded to specify the containment penetrations and required status. The staff has reviewed the proposed change and finds it acceptable because this additional detail will provide added assurance that the action requirement will be met. There is no technical change to the requirement to secure the containment penetrations providing direct access from the containment atmosphere to the outside atmosphere.
7. The statement that the provisions of Specification 3.0.3 are not applicable for 3.9.8.1 and 3.9.8.2 will be removed. This statement is not necessary since the shutdown requirements of TS 3.0.3 do not apply in Modes 5 and 6. This is specified in the current Bases for TS 3.0.3, and is consistent with the proposed change to TS 3.0.3 previously discussed. The staff has reviewed the proposed change and finds it acceptable since this is an editorial change.
8. The current SR 4.9.8.1 will be renumbered as 4.9.8.2.1 and modified by replacing the phrase "At least one shutdown cooling loop" with "One shutdown cooling train." The staff has reviewed the proposed change and finds it acceptable since these changes will provide consistency between related TSs and are consistent with the proposed changes to the LCO.
9. The phrase "and consistent with decay heat requirements" will be removed from SR 4.9.8.2.1. The staff has reviewed the proposed change and finds it acceptable since SDC flow will be adjusted by the plant operators, within the flow requirements of this SR, as necessary to ensure sufficient decay heat removal. It is not necessary to include this phrase to ensure compliance with this TS.
10. The current SR 4.9.8.2 will be renumbered as SR 4.9.8.2.2, and will be modified by replacing the word "loops" with "pump." The phrase "for pump and shutdown cooling valves, or" will be deleted. The requirement to verify reactor vessel water level will also be deleted. Verification of reactor vessel water level is no longer necessary with the proposed change to the applicability of this specification. In addition, "availability" will be changed to "available." The staff has reviewed the proposed changes and finds them acceptable since the changes will provide consistency between related TSs and are consistent with the proposed changes to the LCO.

In addition, the proposed changes to TS 3.9.8.2 are consistent with NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," Revision 1, April 1995.

## 2.11 TS Bases Changes

The Bases for TSs 3.4.1.1, 3.4.1.2, 3.4.1.3, 3.4.1.4, 3.4.1.5, 3.9.8.1, and 3.9.8.2 will be modified to be consistent with the proposed changes previously discussed. The staff does not object to the proposed TS Bases changes.

## 3.0 CONCLUSIONS

The staff has reviewed the licensee's proposed changes discussed in Section 2.0 above. We find that the licensee's proposed TSs will not affect safe operation of Millstone Unit 2. In addition, they are consistent with the requirements of standard TSs in NUREG-1432. Therefore, we find the proposed TSs regarding reactor coolant loops and shutdown cooling trains acceptable. In addition, the staff does not object to the proposed TS Bases changes.

## 4.0 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.

## 5.0 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 46748). 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.

## 6.0 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.

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