

February 12, 1988

Docket No. 50-336

Mr. Edward J. Mroczka
Senior Vice President
Nuclear Engineering and Operations
Northeast Nuclear Energy Company
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Dear Mr. Mroczka:

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. 67081)

The Commission has issued the enclosed Amendment No. 125 to Facility Operating License No. DPR-65 for Millstone Nuclear Power Station, Unit No. 2, in response to your application dated February 9, 1988.

The change modifies Technical Specification 4.7.6.13.e.3, which requires periodic verification of control room air inleakage, and deletes the requirement that such leakage be measured at a pressure differential of 1/16" water gauge.

Your letter dated February 9, 1988, requested that this amendment be treated as an emergency because insufficient time exists for the Commission's usual 30-day notice without extending the current outage. Because the control room air leakage must be confirmed prior to startup of Millstone Unit 2, you determined that emergency circumstances exist in that swift action is necessary to avoid a delay in resumption of plant operation.

A copy of the related Safety Evaluation supporting this amendment is also enclosed. Notice of Issuance and Final Determination of No Significant Hazards Consideration and Opportunity for Hearing will be included in the Commission's biweekly Federal Register notice.

Sincerely,

original signed by

David H. Jaffe, Project Manager
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 125 to DPR-65
2. Safety Evaluation

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PDR

cc w/enclosures:

See next page

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Copy to 2/11/88

Mr. Edward J. Mroczka
Northeast Nuclear Energy Company

Millstone Nuclear Power Station
Unit No. 2

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

NORTHEAST NUCLEAR ENERGY COMPANY
THE CONNECTICUT LIGHT AND POWER COMPANY
THE WESTERN MASSACHUSETTS ELECTRIC COMPANY
DOCKET NO. 50-336
MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.125
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 9, 1988 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.

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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. 125, 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.

FOR THE NUCLEAR REGULATORY COMMISSION


John F. Stolz, Director
Project Directorate I-4
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 12, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 125

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

Replace the following page of the Appendix A Technical Specifications with the enclosed page. The revised page is identified by amendment number and contains vertical lines indicating the areas of change. The corresponding overleaf page is provided to maintain document completeness.

Remove

3/4 7-17

Insert

3/4 7-17

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 2500 cfm \pm 10%.
 2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978. The carbon sample shall have a removal efficiency of \geq 95 percent.
 3. Verifying a system flow rate of 2500 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1975.
- d. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
- e. At least once per 18 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the system at a flow rate of 2500 cfm \pm 10%.
 2. Verifying that on a recirculation signal, the system automatically switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.
 3. Verifying that control room air in-leakage is less than 100 SCFM with the Control Room Air Conditioning System operating in the recirculation/filtration mode.
- f. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2500 cfm \pm 10%.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- g. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2500 cfm \pm 10%.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 125 TO DPR-65

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

1.0 INTRODUCTION

By application for license amendment dated February 9, 1988, Northeast Nuclear Energy Company, et al., (the licensee), requested changes to the Technical Specifications (TS) for Millstone Unit 2 as follows: TS 4.7.6.13.e.3, which requires periodic verification of control room air leakage, would be modified to delete the requirement that leakage be determined at a pressure differential of 1/16" water gauge.

2.0 DISCUSSION AND EVALUATION

On September 25, 1987, the NRC staff issued License Amendment No. 119 for Millstone Unit 2. License Amendment No. 119 included a new requirement in TS 4.7.6.13.e.3, that the control room undergo periodic air leak rate testing to assure that leakage did not exceed 100 SCFM at a differential pressure of 1/16" water gauge. During the first performance of the control room leakage test, during the Cycle 9 refueling outage, the licensee concluded that the Millstone Unit 2 control room could not be maintained at a pressure differential of 1/16" water gauge. The application dated February 9, 1988 requests a change to TS 4.7.6.13.e.3 to delete the requirement that the leakage test be conducted at 1/16" water gauge. The revised TS would be as follows:

"Verifying that control room air in-leakage is less than 100 SCFM with the Control Room Air Conditioning System operating in the recirculation/filtration mode."

In the proposed TS, the requirement that air leakage be determined at a pressure differential of 1/16" water gauge is replaced by the stipulation that leakage be determined with the Control Room Air Conditioning System operating in the recirculation/filtration mode. The proposed change to the TS would allow the licensee to select the appropriate test method for control room leakage.

The purpose of the existing TS 4.7.6.13.e.3 is to verify that the control room will remain habitable following the design basis accident in accordance with the control room habitability analysis. The requirement that the control room leakage be determined at a pressure differential of 1/16" water gauge is not consistent with the control room design in that such pressure differential is not achieved under accident conditions. Following a design basis accident,

the Control Room Air Conditioning System operates in the recirculation/filtration mode. Under these conditions, the pressure differential, between in and outside control room conditions, would be small and mostly due to localized effects. When testing the control room under realistic conditions (in the recirculation/filtration mode) any one of several techniques such as gas dispersion or fan pressurization, will yield an acceptable indication of control room air leakage. The test method can be selected by the licensee.

3.0 EMERGENCY CIRCUMSTANCES

In its February 9, 1988 letter, the licensee requested that this amendment be treated as an emergency because insufficient time exists for the Commission's usual 30-day notice without extending the current outage. Because the control room must undergo air leak testing prior to startup of Millstone Unit 2, the licensee has determined that emergency circumstances exist for approval of the proposed TS change to resume Millstone Unit 2 operation. Startup would not be permitted by the TS unless the requested change is approved. There is insufficient time to provide the usual thirty day's notice before the scheduled start-up date of February 12, 1988. Thus, unless this amendment is promptly authorized, start-up will be delayed for a matter which does not adversely affect plant safety.

In accordance with 10 CFR 50.91(a)(5), the licensee has explained that it could not have avoided this emergency situation since the problems with the control room air leakage testing method were only recently determined. The licensee did not recognize the problems posed by the test pressure it had specified until it attempted to conduct the test. The NRC staff does not believe that the licensee has abused the emergency provisions in this instance. Accordingly, the Commission has determined that there are emergency circumstances warranting prompt approval by the Commission.

In connection with a request indicating an emergency, the Commission expects its licensees to apply for license amendments in a timely fashion.

4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards considerations. This amendment would not:

- (1) Involve a significant increase in the probability or consequences of any accident previously evaluated. Since the control room air leakage can still be acceptably determined with the proposed change to the TS, control room habitability will continue to be assured in the event of a design basis accident.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Since the proposed change to the TS assures continued validation of the control room habitability analysis, no new or different kind of accident will be created as a result of unacceptable control room air leakage.
- (3) Involve a significant reduction in a margin of safety. Since the control room analysis will continue to be validated, there will be no reduction in safety margin with regard to the protection of control room personnel following a design basis accident.

Accordingly, the Commission has determined that this amendment involves no significant hazards considerations.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, efforts were made to contact the Connecticut State representative. The state representative was contacted and had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The 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 made a final no significant hazards consideration finding with respect to this amendment. 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.

7.0 CONCLUSION

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: D. H. Jaffe

Date: February 12, 1988