

February 10, 1999

Mr. Martin L. Bowling, Jr.  
Recovery Officer - Technical Services  
Northeast Nuclear Energy Company  
c/o Ms. Patricia A. Loftus  
Director - Regulatory Affairs  
P. O. Box 128  
Waterford, Connecticut 06385

SUBJECT: ISSUANCE OF AMENDMENT - MILLSTONE NUCLEAR POWER STATION,  
UNIT NO. 2 (TAC NO. MA3955)

Dear Mr. Bowling:

The Commission has issued the enclosed Amendment No. 227 to Facility Operating License No. DPR-65 for the Millstone Nuclear Power Station, Unit No. 2, Technical Specifications, in response to your application dated October 22, 1998.

The amendment allows the licensee to prevent an automatic start of any high pressure safety injection (HPSI) pump when the shutdown cooling system (SDCS) is in operation (Mode 4 and below). An inadvertent start of an HPSI pump could result in overpressurization of the SDCS.

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,

*Stephen Dembek*  
Stephen Dembek, Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosures: 1. Amendment No. 227 to DPR-65  
2. Safety Evaluation

cc w/encls: See next page

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

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Sincerely,

A handwritten signature in cursive script, appearing to read "Stephen Dembek".

Stephen Dembek, Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-336

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2. Safety Evaluation

cc w/encls: See next page

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Unit 2**

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**Millstone Nuclear Power Station  
Unit 2**

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

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. 227  
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 October 22, 1998, 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. 227 , 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, to be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



William M. Dean, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 10, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 227

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

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

Remove

3/4 3-12  
3/4 3-16  
3/4 4-21b  
3/4 5-7  
B 3/4 4-7b  
B 3/4 5-2a

Insert

3/4 3-12  
3/4 3-16  
3/4 4-21b  
3/4 5-7  
B 3/4 4-7b  
B 3/4 5-2a

TABLE 3.3-3

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>CHANNELS TO TRIP</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>ACTION</u>
1. SAFETY INJECTION (SIAS)(d)					
a. Manual (Trip Buttons)	2	1	2	1, 2, 3, 4	1
b. Containment Pressure - High	4	2	3	1, 2, 3	2
c. Pressurizer Pressure - Low	4	2	3	1, 2(e), 3(a)	2
2. CONTAINMENT SPRAY (CSAS)					
a. Manual (Trip Buttons)	2	1	2	1, 2, 3, 4	1
b. Containment Pressure-- High - High	4	2(b)	3	1, 2, 3	2
3. CONTAINMENT ISOLATION (CIAS)					
a. Manual CIAS (Trip Buttons)	2	1	2	1, 2, 3, 4	1
b. Manual SIAS (Trip Buttons)	2	1	2	1, 2, 3, 4	1
c. Containment Pressure - High	4	2	3	1, 2, 3	2
d. Pressurizer Pressure - Low	4	2	3	1, 2(e), 3(a)	2

TABLE 3.3-3 (Continued)

TABLE NOTATION

- (a) Trip function may be bypassed when pressurizer pressure is  $< 1850$  psia; bypass shall be automatically removed when pressurizer pressure is  $\geq 1850$  psia.
- (b) An SIAS signal is first necessary to enable CSAS logic.
- (c) Trip function may be bypassed when steam generator pressure is  $< 700$  psia; bypass shall be automatically removed when steam generator pressure is  $\geq 700$  psia.
- (d) In MODE 4 the HPSI pumps are not required to start automatically on a SIAS.
- (e) Trip may be bypassed during testing pursuant to Special Test Exception 3.10.3.

ACTION STATEMENTS

- ACTION 1 - With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in COLD SHUTDOWN within the next 36 hours.
- ACTION 2 - With the number of OPERABLE channels one less than the Total Number of Channels, operation may continue provided the following conditions are satisfied:
- a. The inoperable channel is placed in either the bypassed or tripped condition within 1 hour. The inoperable channel shall either be restored to OPERABLE status, or placed in the tripped condition, within 48 hours.
  - b. Within 1 hour, all functional units receiving an input from the inoperable channel are also declared inoperable, and the appropriate actions are taken for the affected functional units.
  - c. The Minimum Channels OPERABLE requirement is met; however, one additional channel may be removed from service for up to 48 hours, provided one of the inoperable channels is placed in the tripped condition.

## REACTOR COOLANT SYSTEM

### SURVEILLANCE REQUIREMENT

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4.4.9.3.1 Each PORV shall be demonstrated OPERABLE by:

- a. Performance of a CHANNEL FUNCTIONAL TEST on the PORV actuation channel, but excluding valve operation, within 31 days prior to entering a condition in which the PORV is required OPERABLE and at least once per 31 days thereafter when the PORV is required OPERABLE.
- b. Performance of a CHANNEL CALIBRATION on the PORV actuation channel at least once per 18 months.
- c. Verifying the PORV block valve is open at least once per 72 hours when the PORV is being used for overpressure protection.
- d. Testing in accordance with the inservice test requirements of Specification 4.0.5.

4.4.9.3.2 Verify no more than the maximum allowed number of charging pumps are capable of injecting into the RCS at least once per 12 hours. This is accomplished for each charging pump prevented from injecting into the RCS by verifying the motor circuit breaker is in the open position.

4.4.9.3.3 Verify no more than the maximum allowed number of HPSI pumps are capable of injecting into the RCS at least once per 12 hours. This is accomplished for each HPSI pump prevented from injecting into the RCS by:

- a. Racking down the motor circuit breaker from the power supply circuit; or
- b. Shutting and tagging the discharge valve with the key lock on the control panel (2-SI-654 or 2-SI-656); or
- c. Placing the pump control switch in the pull-to-lock position and removing the breaker control power fuses; or
- d. Placing the pump control switch in the pull-to-lock position and shutting the discharge valve with the key lock on the control panel (2-SI-654 or 2-SI-656).

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

## EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS -  $T_{avg} < 300^{\circ}\text{F}$

### LIMITING CONDITION FOR OPERATION

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3.5.3 One ECCS subsystem comprised of the following shall be OPERABLE:

- a. One OPERABLE\*\*\*\* high-pressure safety injection pump\*\*, and
- b. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a safety injection actuation signal and automatically transferring suction to the containment sump on a sump recirculation actuation signal.\*\*\*

APPLICABILITY: MODES 3\* and 4.

ACTION:

- a. With no ECCS subsystem OPERABLE, restore at least one ECCS subsystem to OPERABLE status within one hour or be in COLD SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

### SURVEILLANCE REQUIREMENTS

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4.5.3.1 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

\* With pressurizer pressure  $< 1750$  psia.

\*\* The provisions of Specifications 3.0.4 and 4.0.4 are not applicable for entry into MODE 4 for the high pressure safety injection pump that is inoperable pursuant to Specification 3.4.9.3 provided the high pressure safety injection pump is restored to OPERABLE status within 1 hour after entering MODE 4.

\*\*\* In MODE 4, the requirement for OPERABLE safety injection and sump recirculation actuation signals is satisfied by use of the safety injection and sump recirculation trip pushbuttons.

\*\*\*\* In MODE 4, the OPERABLE HPSI pump is not required to start automatically on a SIAS. Therefore, the pump control switch for this OPERABLE pump may be placed in the pull-to-lock position without affecting the OPERABILITY of this pump.

## REACTOR COOLANT SYSTEM

### BASES

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

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

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

Restrictions on RCS makeup pumping capacity are included in Technical Specification 3.4.9.3. These restrictions are based on balancing the requirements for LTOP and shutdown risk. For shutdown risk reduction, it is desirable to have maximum makeup capacity and to maintain the RCS full (not vented). However, for LTOP it is desirable to minimize makeup capacity and vent the RCS. To satisfy these competing requirements, makeup pumps can be made not capable of injecting, but available at short notice. A pump can be considered to be not capable of injecting into the RCS if the pump breaker is racked down under administrative control. Alternate methods include placing the pump control switch in pull-to-lock with the discharge valve closed, placing the pump control switch in pull-to-lock with the breaker control power fuses removed, or maintaining the associated discharge valve closed under administrative control. These methods prevent inadvertent pump injections while allowing manual actions to rapidly restore the makeup capability if conditions require the use of additional charging or HPSI pumps for makeup in the event of a loss of RCS inventory or reduction in shutdown margin.

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

## EMERGENCY CORE COOLING SYSTEMS

### BASES

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The purpose of the ECCS throttle valve surveillance requirements is to provide assurance that proper ECCS flows will be maintained in the event of a LOCA. Maintenance of proper flow resistance and pressure drop in the piping system to each injection point is necessary to: (1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration, (2) provide the proper flow split between injection points in accordance with the assumptions used in the ECCS-LOCA analyses, and (3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS-LOCA analyses.

Verification of the correct position for the mechanical and/or electrical valve stops can be performed by either of the following methods:

1. Visually verify the valve opens to the designated throttled position; or
2. Manually position the valve to the designated throttled position and verify that the valve does not move when the applicable valve control switch is placed to "OPEN."

In MODE 4 the automatic safety injection signal generated by low pressurizer pressure and high containment pressure and the automatic sump recirculation actuation signal generation by low refueling water storage tank level are not required to be OPERABLE. Automatic actuation in MODE 4 is not required because adequate time is available for plant operators to evaluate plant conditions and respond by manually operating engineered safety features components. Since the manual actuation (trip pushbuttons) portion of the safety injection and sump recirculation actuation signal generation is required to be OPERABLE in MODE 4, the plant operators can use the manual trip pushbuttons to rapidly position all components to the required accident position. Therefore, the safety injection and sump recirculation actuation trip pushbuttons satisfy the requirement for generation of safety injection and sump recirculation actuation signals in MODE 4.

In MODE 4, the OPERABLE HPSI pump is not required to start automatically on a SIAS. Therefore, the pump control switch for this OPERABLE pump may be placed in the pull-to-lock position without affecting the OPERABILITY of the pump. This will prevent the pump from starting automatically, which could result in overpressurization of the Shutdown Cooling System. Only one HPSI pump may be OPERABLE in MODE 4 with RCS temperatures less than or equal to 275°F due to the restricted relief capacity with Low-Temperature Overpressure Protection System. To reduce shutdown risk by having additional pumping capacity readily available, a HPSI pump may be made inoperable but available at short notice by shutting its discharge valve with the key lock on the control panel.

The provision in Specification 3.5.3 that Specifications 3.0.4 and 4.0.4 are not applicable for entry into MODE 4 is provided to allow for connecting the HPSI pump breaker to the respective power supply or to remove the tag and open the discharge valve, and perform the subsequent testing necessary to declare the inoperable HPSI pump OPERABLE. Specification 3.4.9.3 requires all HPSI pumps to be not capable of injecting into the RCS when RCS temperature is at or below 190°F. Once RCS temperature is above 190°F one HPSI pump can be capable of injecting into the RCS. However, sufficient time may not be available to ensure one HPSI pump is OPERABLE prior to entering MODE 4 as required by Specification 3.5.3. Since Specifications 3.0.4 and 4.0.4



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 227

TO FACILITY OPERATING LICENSE NO. DPR-65

NORTHEAST NUCLEAR ENERGY COMPANY

THE CONNECTICUT LIGHT AND POWER COMPANY

THE WESTERN MASSACHUSETTS ELECTRIC COMPANY

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

1.0 INTRODUCTION

By letter dated October 22, 1998, the Northeast Nuclear Energy Company, et al. (the licensee), submitted a request for changes to the Millstone Nuclear Power Station, Unit No. 2 Technical Specifications (TSs). The licensee is proposing to change TS 3.3.2.1, "Instrumentation – Engineered Safety Feature Actuation System Instrumentation"; 3.4.9.3, "Reactor Coolant System – Overpressure Protection Systems"; and 3.5.3, "Emergency Core Cooling Systems – ECCS Subsystems - Tavg < 300° F." In Licensee Event Report (LER) 98-013-00, "Shutdown Cooling System Could be Over Pressurized by Inadvertent High Pressure Safety Injection Pump Start," dated June 25, 1998, the licensee reported that additional measures should be taken to reduce the potential for shutdown cooling system (SDCS) overpressurization due to an inadvertent start of a high-pressure safety injection (HPSI) pump. The licensee's amendment request addresses the concern raised in this LER. The amendment allows the licensee to prevent an automatic start of any HPSI pump when the SDCS is in operation (Mode 4 and below). An inadvertent start of an HPSI pump could result in overpressurization of the SDCS.

2.0 EVALUATION

To reduce the potential for SDCS overpressurization due to an inadvertent start of an HPSI pump, the licensee proposed TS changes that will no longer require an HPSI pump to start automatically following the generation of a safety injection actuation signal (SIAS) when the plant is operating in Mode 4 or below. The licensee is also replacing the HPSI breaker control switches with switches that have the pull-to-lock capability. These changes will allow the control room operator to place the HPSI pump breaker control switch in the pull-to-lock position prior to aligning the SDCS to the reactor coolant system (RCS). With the breaker control switch in the pull-to-lock position, the pump is not capable of starting automatically, but can be manually started by the control room operator. The proposed TS changes, and the staff's corresponding evaluations, follow.

## 2.1 Technical Specifications 3.3.2.1 and 3.5.3

- a. Table 3.3-3, "Engineered Safety Feature Actuation System Instrumentation," will be revised by replacing Table Notation (d). This change will state that it is acceptable in Mode 4 for the HPSI pumps not to start automatically on an SIAS. The automatic SIASs on low pressurizer pressure and high containment pressure are not required to be operable in Mode 4. However, the manual safety injection pushbuttons are required in Mode 4. This will allow the operable HPSI pump control switch to be placed in the pull-to-lock position without affecting the operability of that pump.
- b. Page 3/4 3-12 (i.e., page 1 of Table 3.3-3) was previously revised by License Amendment No. 15 and License Amendment No. 63. These amendment numbers will be added to the bottom of the page.
- c. A new footnote (\*\*\*\*) will be added to TS 3.5.3. The footnote will state that the HPSI pump required in Mode 4 is not required to start automatically on an SIAS. (The automatic SIASs on low pressurizer pressure and high containment pressure are not required to be operable in Mode 4. However, the manual safety injection pushbuttons are required in Mode 4.) This will allow the operable HPSI pump control switch to be placed in the pull-to-lock position without affecting the operability of that pump.

The proposed changes to TSs 3.3.2.1 and 3.5.3 will no longer require the HPSI pump, which is required to be operable in Mode 4, to start automatically on an SIAS. (The automatic SIASs on low pressurizer pressure and high containment pressure are not required to be operable in Mode 4. However, the manual safety injection pushbuttons are required in Mode 4.) This will allow the operable HPSI pump control switch to be placed in the pull-to-lock position without affecting the operability of that pump. All HPSI pumps will be prevented from automatically starting when the plant is in Mode 4 and the SDCS is aligned to the RCS. This is to prevent an inadvertent start of the HPSI pump, which could overpressurize the SDCS. However, the HPSI pump can be manually started by the control room operator. These changes will not reduce the requirement for at least one HPSI pump to be operable in Mode 4. In Mode 5, no HPSI pumps are required to be operable to meet TS requirements. However, the licensee stated that the management of shutdown risk will ensure sufficient inventory makeup capability is available. The licensee stated that the proposed changes will have no adverse effect on plant operation. Based on the staff's review of the information provided by the licensee, the staff finds the TS changes to be acceptable because they will correct the problem the licensee identified in LER 98-013-00.

The editorial correction to TS page 3/4 3-12 corrects an editorial error. Therefore, this change is acceptable.

## 2.2 Technical Specification 3.4.9.3

- a. The wording of Surveillance Requirement (SR) 4.4.9.3.2 will be modified for clarity. This is an editorial change only.

- b. SR 4.4.9.3.3 will be modified to allow the use of the new pull-to-lock feature of the HPSI pump control switches to satisfy low temperature overpressure protection mass input requirements. In addition, the wording will be modified to be consistent with the modified wording of SR 4.4.9.3.2.

The licensee stated that the proposed change to TS 3.4.9.3 and SR 4.4.9.3.3, will allow the use of the pull-to-lock feature of the HPSI pump control switches to satisfy low temperature overpressure protection mass input requirements. This will not affect either the low temperature overpressure protection HPSI pump mass input restrictions or the level of control to ensure the HPSI pumps are not capable of injecting into the RCS. The licensee stated that the proposed changes will have no adverse effect on plant operation. Based on the staff's review of the information provided by the licensee, the staff finds the TS changes to be acceptable because they will correct the problem the licensee identified in LER 98-013-00.

The editorial change to SR 4.4.9.3.2 improves the clarity of the TS and is, therefore, acceptable.

### 2.3 Technical Specification Bases

The Bases of the applicable TSs will be revised to reflect the proposed changes. Since the Bases changes appropriately reflect the above changes to the TS, they are acceptable.

### 2.4 Evaluation Summary

On the basis of the staff's review of the TS changes and the supporting information provided in the licensee's October 22, 1998, letter, the staff concludes that the licensee's proposed TS changes to (1) delete the automatic start of the high-pressure safety injection pump upon receipt of a safety injection signal in Mode 4, and (2) perform editorial corrections, are acceptable.

### 3.0 STATE CONSULTATION

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

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (63 FR 66600, December 2, 1998). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 5.0 CONCLUSION

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

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