

September 30, 97

Mr. Neil S. Carns  
Senior Vice President  
and Chief Nuclear Officer  
Northeast Nuclear Energy Company  
c/o Ms. Patricia A. Loftus  
Director - Nuclear Licensing Services  
P.O. Box 128  
Waterford, CT 06385

SUBJECT: ISSUANCE OF AMENDMENT RELATING TO THE ENCLOSURE BUILDING TECHNICAL SPECIFICATIONS - MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2 (TAC NO. M98374)

Dear Mr. Carns:

The Commission has issued the enclosed Amendment No. 208 to Facility Operating License No. DPR-65 for the Millstone Nuclear Power Station, Unit No. 2, in response to your application dated April 10, 1997.

The amendment relocates the Technical Specification (TS) surveillance requirement for attaining a negative pressure in the enclosure building; addresses operability; deletes the definition for enclosure building integrity; modifies the enclosure building access opening requirements; and makes editorial changes for clarification and consistency. The TS Bases are also updated to reflect the proposed changes including the need to maintain the integrity of the enclosure building and to support previously approved laboratory testing requirements for charcoal filter sample testing.

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,

Original signed by:

Daniel G. McDonald Jr., Sr. Project Manager  
Special Projects Office - Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosures: 1. Amendment No. 208 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

September 30, 1997

Mr. Neil S. Carns  
Senior Vice President  
and Chief Nuclear Officer  
Northeast Nuclear Energy Company  
c/o Ms. Patricia A. Loftus  
Director - Nuclear Licensing Services  
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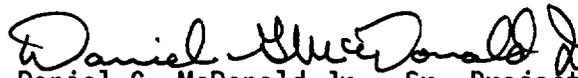
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2. Safety Evaluation

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  
AND WESTERN MASSACHUSETTS ELECTRIC COMPANY

DOCKET NO. 50-336

MILLSTONE NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 208  
License No. DPR-65

- I. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by Northeast Nuclear Energy Company, et al. (the licensees) dated April 10, 1997, 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, Facility Operating License No. DPR-65 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. 208, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance to be implemented within 30 days from the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Phillip F. McKee  
Deputy Director for Licensing  
Special Projects Office  
Office of Nuclear Reactor Regulation

Attachment: Changes to Technical  
Specifications

Date of Issuance: September 30, 1997

ATTACHMENT TO LICENSE AMENDMENT NO. 208

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

Replace the following pages of the Operating License and 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

II  
VII

1-5

3/4 6-25  
3/4 6-26  
3/4 6-27  
3/4 6-28

3/4 9-16  
3/4 9-17  
3/4 9-18

B 3/4 6-5  
B 3/4 9-3

Insert

II  
VII

1-5

3/4 6-25  
3/4 6-26  
3/4 6-27  
3/4 6-28

3/4 9-16  
3/4 9-17  
3/4 9-18

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B 3/4 9-3

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## DEFINITIONS

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### AXIAL SHAPE INDEX

1.23 The AXIAL SHAPE INDEX ( $Y_E$ ) used for normal control and indication is the power level detected by the lower excore nuclear instrument detectors (L) less the power level detected by the upper excore nuclear instrument detectors (U) divided by the sum of these power levels. The AXIAL SHAPE INDEX ( $Y_I$ ) used for the trip and pretrip signals in the reactor protection system is the above value ( $Y_E$ ) modified by an appropriate multiplier (A) and a constant (B) to determine the true core axial power distribution for that channel.

$$Y_E = \frac{L-U}{L+U} \qquad Y_I = AY_E + B$$

### CORE OPERATING LIMITS REPORT

1.24 The CORE OPERATING LIMITS REPORT is the unit specific document that provides the core operating limits for the current operating reload cycle. These cycle specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.1.7. Plant operation within these operating limits is addressed in individual specifications.

ENCLOSURE BUILDING INTEGRITY - DELETED

### REACTOR TRIP SYSTEM RESPONSE TIME

1.26 The REACTOR TRIP SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its trip setpoint at the channel sensor until electrical power is interrupted to the CEA drive mechanism.

### ENGINEERING SAFETY FEATURE RESPONSE TIME

1.27 The ENGINEERED SAFETY FEATURE RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of

## CONTAINMENT SYSTEMS

### 3/4.6.5 SECONDARY CONTAINMENT

#### ENCLOSURE BUILDING FILTRATION SYSTEM

#### LIMITING CONDITION FOR OPERATION

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3.6.5.1 Two separate and independent Enclosure Building Filtration Trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one Enclosure Building Filtration Train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in COLD SHUTDOWN within the next 36 hours.

#### SURVEILLANCE REQUIREMENTS

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4.6.5.1 Each Enclosure Building Filtration Train shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filter and charcoal absorber train and verifying that the train operates for at least 10 hours with the heaters on.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal absorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the train by:

## CONTAINMENT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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1. Verifying that the cleanup train 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 train flow rate is 9000 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.\*
  3. Verifying a train flow rate of 9000 cfm  $\pm 10\%$  during train operation when tested in accordance with ANSI N510-1975.
- c. 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.\*
- d. At least once per 18 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is  $\leq 6$  inches Water Gauge while operating the train at a flow rate of 9000 cfm  $\pm 10\%$ .
  2. Verifying that the train starts on an Enclosure Building Filtration Actuation Signal (EBFAS).
- e. 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 train at a flow rate of 9000 cfm  $\pm 10\%$ .

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\* ASTM D3803-89 shall be used in place of ANSI N509-1976 as referenced in table 2 of Regulatory Guide 1.52. The laboratory test of charcoal should be conducted at a temperature of 30°C and a relative humidity of 95% within the tolerances specified by ASTM D3803-89. Additionally, the charcoal sample shall have a removal efficiency of  $\geq 95\%$ .

**CONTAINMENT SYSTEMS**

**SURVEILLANCE REQUIREMENTS (Continued)**

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- f. After each complete or partial replacement of a charcoal absorber bank by verifying that the charcoal absorbers 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 train at a flow rate of 9000 cfm  $\pm$  10%.

**CONTAINMENT SYSTEMS**

**ENCLOSURE BUILDING**

**LIMITING CONDITION FOR OPERATION**

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3.6.5.2 The Enclosure Building shall be OPERABLE.

**APPLICABILITY:** MODES 1, 2, 3 and 4.

**ACTION:**

With the Enclosure Building inoperable, restore the Enclosure Building to OPERABLE status within 24 hours or be in COLD SHUTDOWN within the next 36 hours.

**SURVEILLANCE REQUIREMENTS**

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4.6.5.2.1 OPERABILITY of the Enclosure Building shall be demonstrated at least once per 31 days by verifying that each access opening is closed except when the access opening is being used for normal transit entry and exit.

4.6.5.2.2. At least once per 18 months verify each Enclosure Building Filtration Train produces a negative pressure of greater than or equal to 0.25 inches W.G. in the Enclosure Building Filtration Region within 1 minute after an Enclosure Building Filtration Actuation Signal.

## REFUELING OPERATIONS

### STORAGE POOL AREA VENTILATION SYSTEM - FUEL STORAGE

#### LIMITING CONDITION FOR OPERATION

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3.9.15 At least one Enclosure Building Filtration Train shall be OPERABLE and capable of automatically initiating operation in the auxiliary exhaust mode and exhausting through HEPA filters and charcoal adsorbers on a storage pool area high radiation signal.

APPLICABILITY: WHENEVER IRRADIATED FUEL IS IN THE STORAGE POOL.

#### ACTION:

With the requirements of the above specification not satisfied, suspend all operations involving movement of fuel within the storage pool or crane operation with loads over the storage pool until at least one Enclosure Building Filtration Train is restored to OPERABLE status.

#### SURVEILLANCE REQUIREMENTS

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4.9.15 The above required Enclosure Building Filtration Train shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for at least 10 hours with the heaters on.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the train by:

## REFUELING OPERATIONS

### SURVEILLANCE REQUIREMENTS (Continued)

---

1. Verifying that the cleanup train 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 train flow rate is 9000 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.\*
  3. Verifying a train flow rate of 9000 cfm  $\pm$  10% during train operation when tested in accordance with ANSI N510-1975.
- c. 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.\*
- d. At least once per 18 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is  $\leq$  6 inches Water Gauge while operating the train at a flow rate of 9000 cfm  $\pm$  10%.
  2. Verifying that on a Spent Fuel Storage Pool Area high radiation signal, the train automatically starts (unless already operating) and directs its exhaust flow through the HEPA filters and charcoal adsorber banks.
- e. 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 train at a flow rate of 9000 cfm  $\pm$  10%.

---

\* ASTM D3803-89 shall be used in place of ANSI N509-1976 as referenced in table 2 of Regulatory Guide 1.52. The laboratory test of charcoal should be conducted at a temperature of 30°C and a relative humidity of 95% within the tolerances specified by ASTM D3803-89. Additionally, the charcoal sample shall have a removal efficiency of  $\geq$  95%.

## REFUELING OPERATIONS

### SURVEILLANCE REQUIREMENTS (Continued)

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- f. 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 train at a flow rate of 9000 cfm  $\pm$  10%. |

## CONTAINMENT SYSTEMS

### BASES

#### 3/4.6.5 SECONDARY CONTAINMENT

##### 3/4.6.5.1 ENCLOSURE BUILDING FILTRATION SYSTEM

The OPERABILITY of the Enclosure Building Filtration System ensures that containment leakage occurring during LOCA conditions into the annulus will be filtered through the HEPA filters and charcoal adsorber trains prior to discharge to the atmosphere. This requirement is necessary to meet the assumptions used in the accident analyses and limit the site boundary radiation doses to within the limits of 10 CFR 100 during LOCA conditions.

The laboratory testing requirement for the charcoal sample to have a removal efficiency of  $\geq 95\%$  is more conservative than the elemental and organic iodine removal efficiencies of 90% and 70%, respectively, assumed in the DBA analyses for the EBFS charcoal adsorbers in the Millstone Unit 2 Final Safety Analysis Report. A removal efficiency acceptance criteria of  $\geq 95\%$  will ensure the charcoal has the capability to perform its intended safety function throughout the length of an operating cycle.

##### 3/4.6.5.2 ENCLOSURE BUILDING

The OPERABILITY of the Enclosure Building ensures that the releases of radioactive materials from the primary containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the accident analyses. This restriction, in conjunction with operation of the Enclosure Building Filtration System, will limit the site boundary radiation doses to within the limits of 10 CFR 100 during accident conditions.

One Enclosure Building Filtration System train is required to establish a negative pressure of 0.25 inches W.G. in the Enclosure Building Filtration Region within one minute after an Enclosure Building Filtration Actuation Signal is generated. The one minute time requirement does not include the time necessary for the associated emergency diesel generator to start and power Enclosure Building Filtration System equipment.

To enable the Enclosure Building Filtration System to establish the required negative pressure in the Enclosure Building, it is necessary to ensure that all Enclosure Building access openings are closed. For double door access openings, only one door is required to be closed and latched, except for normal passage. For single door access openings, that door is required to be closed and latched, except for normal passage.

A door is OPERABLE when it is capable of automatically closing and latching. If the required door is not capable of automatically closing and latching, the door must be maintained closed and latched or personnel may be stationed at the door to ensure that the door is closed and latched after each transit through the door. Otherwise, the access opening (door) should be declared inoperable and the appropriate technical specification action statement entered.

## REFUELING OPERATIONS

### BASES

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#### 3/4.9.13 STORAGE POOL RADIATION MONITORING

The OPERABILITY of the storage pool radiation monitors ensures that sufficient radiation monitoring capability is available to detect excessive radiation levels resulting from 1) the inadvertent lowering of the storage pool water level or 2) the release of activity from an irradiated fuel assembly.

#### 3/4.9.14 & 3/4.9.15 STORAGE POOL AREA VENTILATION SYSTEM

The limitations on the storage pool area ventilation system ensures that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the accident analyses.

The laboratory testing requirement for the charcoal sample to have a removal efficiency of  $\geq 95\%$  is more conservative than the elemental and organic iodine removal efficiencies of 90% and 70%, respectively, assumed in the DBA analyses for the EBFS charcoal adsorbers in the Millstone Unit 2 Final Safety Analysis Report. A removal efficiency acceptance criteria of  $\geq 95\%$  will ensure the charcoal has the capability to perform its intended safety function throughout the length of an operating cycle.

#### 3/4.9.16 SHIELDED CASK

The limitations of this specification ensure that in an event of a cask tilt accident 1) the doses from ruptured fuel assemblies will be within the assumptions of the safety analyses, 2)  $K_{\text{eff}}$  will remain  $\leq .95$ .

#### 3/4.9.17 MOVEMENT OF FUEL IN SPENT FUEL POOL

The limitations of this specification ensure that, in the event of a fuel assembly or a consolidated fuel storage box drop accident into a Region B or C rack location completing a 4-out-of-4 fuel assembly geometry,  $K_{\text{eff}}$  will remain  $\leq 0.95$ .

#### 3/4.9.18 SPENT FUEL POOL - REACTIVITY CONDITION

The limitations described by Figures 3.9-1a, 3.9-1b, and 3.9-3 ensure that the reactivity of fuel assemblies and consolidated fuel storage boxes, introduced into the Region C spent fuel racks, are conservatively within the assumptions of the safety analysis.

The limitations described by Figure 3.9-4 ensure that the reactivity of the fuel assemblies, introduced into the Region A spent fuel racks, are conservatively within the assumptions of the safety analysis.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 208

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 April 10, 1997, 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 proposed changes would modify the TSs for the enclosure building.

Specifically, the proposed changes would relocate the surveillance requirement for attaining a negative pressure in the enclosure building from TS 3.6.5.1 "Enclosure Building Filtration System," to TS 3.6.5.2, "Enclosure Building Integrity." TS 3.6.5.2 would also be changed to address operability, which includes integrity requirements, and Definition 1.25, "Enclosure Building Integrity," would be deleted. TS 4.6.5.2, "Surveillance Requirements," would be modified to require each access opening in the enclosure building to be closed instead of the current requirement to close each door (some access openings have two doors in series) in each access opening. This TS would also be renumbered as 4.6.5.2.1. Editorial changes are proposed for clarification and consistency. The TS Bases and index pages would also be updated to reflect the proposed changes including the need to maintain the integrity of the enclosure building and to support previously approved laboratory testing requirements for charcoal filter sample testing.

2.0 BACKGROUND

The enclosure building is a limited-leakage, steel-framed structure that completely surrounds the containment. It is designed and constructed to ensure that any leakage of radioactive materials to the environment would not exceed an acceptable upper limit in the event of a design basis loss-of-coolant accident (LOCA) or movement of loads over the spent fuel pool. A slight negative pressure is maintained by the enclosure building filtration system (EBFS) and the system exhausts the air through charcoal and high-

efficiency particulate air (HEPA) filters prior to discharging to the atmosphere.

The enclosure building filtration region (EBFR) encompasses an area between the containment and enclosure building, the penetration rooms, and the engineered safety feature room. The EBFS maintains a slightly negative pressure of .25 inch water gauge within 60 seconds of receiving an actuation signal following a LOCA. Thus, air being discharged from the EBFR would be processed through the charcoal and HEPA filters located in the EBFS prior to being released to the atmosphere during a LOCA as previously noted. However, the EBFS can also be powered by the emergency diesel generators (EDGs) if the normal source of power is lost concurrent with a LOCA. To account for this situation, the safety analysis for Millstone Unit 2 conservatively assumes that the release of radioactivity from the primary containment will continue for 110 seconds until the EDGs are started, the EBFS is powered and the required negative pressure is established. It is necessary to maintain the integrity of the enclosure building, above and beyond the normal everyday personnel passage through the doorways, to maintain the required negative pressure.

### 3.0 EVALUATION

In relation to the first portion of the request, the licensee has proposed to relocate the surveillance requirement for attaining a negative pressure in the enclosure building from TS 3.6.5.1 "Enclosure Building Filtration System," to TS 3.6.5.2, "Enclosure Building Integrity." The word "Integrity" would be removed from the title of TS 3.6.5.2 and replaced in the TS limiting condition for operation by addressing operability which supports the deletion of Definition 1.25, "Enclosure Building Integrity," and the addition of Surveillance Requirement 4.6.5.2.2. The licensee also proposes changes to the Bases section to support the requested change.

TS 3.6.5.2 allows 24 hours to restore the integrity of the enclosure building if it has been breached. However, the licensee notes that the current surveillance requirement in TS 3.6.5.1 to achieve a negative pressure of .25 inch water gauge in 60 seconds would likely not be possible. Although the EBFS would still be effective in reducing the levels of radionuclides that could be released to the atmosphere in the advent of a LOCA, the required negative pressure could not be met in accordance with Surveillance Requirement, 4.6.5.1.d.3, currently located in the EBFS TS 3.6.5.1. As a result, TS 3.0.3 requiring an immediate shutdown, would have to be entered since TS 3.6.5.1 does not address the enclosure building integrity and both trains of the EBFS would be assumed inoperable. This cascading of TSs has been recognized and corrections have been made in the improved Standard Technical Specifications for Combustion Engineering Plants, NUREG-1432, Sections 3.6.11 and 3.6.13.

The proposed changes to TSs 3.6.5.1 and 3.6.5.2, the relocation of Surveillance Requirement 4.6.5.1.d.3 to TS 3.6.5.2 and renumbered as 4.6.5.2.2, changes to Bases Sections 3/4.6.5.1 and 3/4.6.5.2, the use of operability instead of integrity in TS 3.6.5.2, and the deletion of Definition 1.25 will resolve the conflict that currently exists between

TSs 3.6.5.1 and 3.6.5.2. Specifically, the requirement to establish and maintain a negative pressure in the enclosure building boundary included in TS 3.6.5.1 belongs in TS 3.6.5.2. In the event enclosure building operability is not maintained in Modes 1 through 4, the action statement for the limiting condition for operation, TS 3.6.5.2, requires that enclosure building operability must be restored within 24 hours. Twenty-four hours is a reasonable completion time considering the limited leakage design of containment and the low probability of a design-basis accident occurring during this time period. Therefore, the NRC staff has determined that the proposed changes are acceptable.

The second portion of the request would modify TS 4.6.5.2, "Surveillance Requirements," to require each access opening in the enclosure building to be closed instead of the current requirement to close each door (some access openings have two doors in series) in each access opening, "integrity" would be revised to address operability, and would also be renumbered as Surveillance Requirement 4.6.5.2.1. All access doors are considered operable when they are capable of automatically closing and latching.

The current design of the enclosure building incorporates double doors in some of the enclosure building access openings. The licensee notes that there is no credit given for the redundant doors in the radiological dose calculations performed for the design-basis accidents. All single doors are currently required to be shut and latched except for normal passage. The current TS requirement in the double door design requires both doors be closed and latched even though credit is not given for the redundant design.

The NRC issued Amendment No. 45 to Facility Operating License No. DPR-65 for Millstone Nuclear Power Station, Unit 2 on December 8, 1978. The NRC staff indicated in its supporting Safety Evaluation that several of the access openings in the enclosure building only had a single door and approved deleting the requirement to have at least one door closed in an opening during normal passage. The original TS requirement incorrectly assumed double doors in all of the access openings, thus, a single door closure is acceptable to assure the integrity of the enclosure building considering normal passage. Therefore, the proposed change that requires only one door in the redundant door design be shut and latched, except for normal passage, is acceptable.

The third portion of the request involves proposed changes to provide consistency within the existing TSs and to support the proposed changes discussed above. The index pages will be updated, consistency in the use of capital letters and the interchangeable use of "system" and "train" will be changed to use "train" where appropriate. TS 3.9.5, "Storage Pool Area Ventilation System - Fuel Storage," currently requires that at least one "system" (will be changed to "train") of the EBFS be operable. However, the required action statement refers to the spent fuel pool ventilation system instead of the EBFS. This inconsistency would be corrected by changing the action statement to refer to the EBFS. TS Bases Sections 3/4.6.5.1, 3/4.6.5.2, and 3/4.9.15 would be modified to reflect the proposed changes. In addition, TS Bases Sections 3/4.6.5.1 and 3/4.9.15 would be updated to clarify the laboratory testing requirements that have been previously approved by the NRC staff. The testing requirements were approved in Amendment No. 175 to

Facility Operating License No. DPR-65 for the Millstone Nuclear Power Station, Unit 2, dated May 23, 1994.

The proposed changes provide clarification and needed consistency with respect to requirements, the containment enclosure building and to clarify laboratory testing requirements previously approved by amendment; therefore, these changes are acceptable.

#### 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 amendment also relates to changes in record keeping, reporting, or administrative procedures or 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 (62 FR 24987 dated May 7, 1997). 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.

Principal Contributor: D. McDonald

Date: **September 30, 1997**