

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
THE HARTFORD ELECTRIC LIGHT COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
MIDDLESEX ELECTRIC COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORFOLK SOUTHERN ENERGY COMPANY

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May 21, 1980

Docket Nos. 50-213
50-245
50-336
A00974

Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: (1) D. G. Eisenhut letter to All Power Reactor Licensees dated April 10, 1980.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Proposed Revisions to Technical Specifications

In Reference (1), Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) were requested to submit proposed changes to Technical Specifications to incorporate the requirements of Enclosure 1 into the existing Technical Specifications for each of the three operating units. It is noted that CYAPCO and NNECO do not concur that the attached proposed changes are necessary to ensure continued safe operation of the facilities. Nonetheless, pursuant to 10CFR50.90, NNECO hereby proposes to amend its operating license, DPR-65, by incorporating the revisions identified in Attachment 1 into the Millstone Unit No. 2 Technical Specifications.

As Millstone Unit No. 2 is the only one of the three units with Standard Technical Specifications, only that Unit is proposing revisions which closely parallel the Reference (1) request. One substantive change is the time allocated to achieve the hot standby condition in the event of circumstances in excess of those addressed in the Technical Specifications. The proposed interval is eight hours, rather than the NRC-proposed interval of one hour. This change is more conservative in that sufficient time is allocated to conduct a controlled shutdown and/or cooldown in the event such action is required. Allocation of only one hour would require a plant trip which yields a greater probability of resulting in off-normal operating conditions. This circumstance would be most undesirable in that less than a full complement of safety systems would be operable for circumstances in which the generic action statements must be invoked.

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Regarding the Haddam Neck Plant and Millstone Unit No. 1, CYAPCO and NNECO have reviewed the Reference (1) request and have determined that the existing formats of the Technical Specifications do not lend themselves to adoption of the Staff requests. The major complication involves the review of each individual specification and possible incorporation of a statement indicating that the generic action statements of Section 3.0 are not applicable. This process is necessary to ensure that the Technical Specifications do not require a plant shutdown for conditions where such action is inappropriate, unwarranted, or independent of the failure involved. The Commission's existing Standard Technical Specifications recognize the necessity of this effort. The magnitude of the task is such that it is not appropriate to undertake this review process at this time, as the Reference (1) request does not constitute a matter of safety significance. It is noted that the Haddam Neck Plant is currently in the process of converting to Standard Technical Specifications, and it is envisioned that the intent of Reference (1) will be incorporated into that effort. It is acknowledged that the expanded definition of the term OPERABLE - OPERABILITY could be incorporated at this time, but this change would not alter the current intent and does not warrant a request for a license amendment.

NNECO has reviewed the attached changes pursuant to the requirements of 10CFR50.59 and has determined that they do not constitute unreviewed safety questions. The proposed changes serve to clarify the intent of existing Specification requirements.

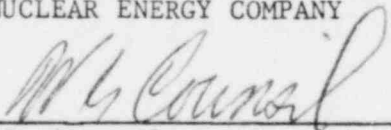
The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved the attached proposed changes and concurred in the above determination.

NNECO has reviewed the proposed license amendment pursuant to the requirements of 10CFR170 and has determined that no fee is applicable in this instance. The basis for this determination is that the proposed amendments result from a written Commission request for the applications, they serve to clarify existing Technical Specifications, they have only minor safety significance, and would be issued for the convenience of the Commission.

We trust you find the attached proposal responsive to the Reference (1) request.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Vice President

Attachment

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

May 21, 1980

Then personally appeared before me W. G. Council, who being duly sworn, did state that he is Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Sheila M. Dates
Notary Public

My Commission Expires March 31, 1981