

**NORTHEAST UTILITIES**

THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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December 11, 1989

Docket No. 50-245  
B13329

Re: T.S. 3.7.A.6.c

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1  
Interpretation of Technical Specification  
Section 3.7.A.6.c

The purpose of this letter is to provide Northeast Nuclear Energy Company's (NNECO) interpretation of the phrase "important to safety" in Technical Specification 3.7.A.6.c.

An amendment to Millstone Unit No. 1's operating license was requested,<sup>(1)</sup> to permit reactor operation with a deinerted reactor containment drywell for up to 48 hours. This license amendment was granted via Amendment No. 102, dated June 5, 1985.<sup>(2)</sup> The request was prompted by problems with the belts of the Containment Drywell Cooling Fans, as described in the NRC Staff's Safety Evaluation, Section 2.1, for Amendment No. 102, which stated "The belt involved has been in continuous operation for more than 300 days. Large motor-driven circulators control the containment atmospheric temperature by forcing large volumes of the atmosphere through coolers. Loss of this atmospheric cooling capability due to belt slippage or failure causes containment temperature to rise to the limiting conditions for operation."

The approved amendment added Technical Specification Section 3.7.A.6.c, however, it contained the words "relating to testing, surveillances, or maintenance on equipment important to safety," which were not proposed by NNECO.

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- (1) J. F. Opeka letter to J. A. Zwolinski, "Millstone Unit No. 1, Proposed Revision to Technical Specifications--Containment Systems," dated May 15, 1985.
  - (2) J. A. Zwolinski letter to J. F. Opeka, "Reactor Operation with Deinerted Containment Drywell," dated June 5, 1985.

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It was clearly our intent that the proposed Technical Specification change provide plant operations personnel with the ability to enter the drywell at power for the purpose of performing leak inspections, equipment adjustments and other inspection and maintenance activities (specifically, inspection and maintenance of belts on Drywell Cooling Fans which are not "safety-related"). It was our understanding that the NRC Staff's intent had been to include equipment beyond the safety-related set in the original amendment because of the Staff's acknowledgement of the equipment in question. It should be noted that drywell entry was made shortly after receipt of Amendment No. 102, for inspection and maintenance of the subject equipment.

Since the words "important to safety" have generally been interpreted to mean "safety-related," an inconsistency was created when the phrase was interpreted by NNECO to mean, in this specific instance, not equivalent to "safety-related." In order to alleviate this inconsistency in our interpretation, we proposed a Technical Specification change which replaced the phrase "important to safety" with "necessary to ensure safe plant operation" via letter dated June 1, 1987.<sup>(3)</sup>

The proposed change was consistent with the intent of the original amendment request and made to eliminate any possible ambiguities associated with the exact definition of the phrase "important to safety," while maintaining full compliance with the associated Technical Specification governing drywell oxygen concentrations. However, the request was denied via letter dated April 11, 1989.<sup>(4)</sup> In the letter, the Staff stated "...containment deinerting and entry should only be made for testing, surveillance, or maintenance of safety-related equipment while the reactor is operating."

As a result of this denial and associated inconsistencies, NNECO reviewed the interpretation of the phrase "important to safety" in Technical Specification 3.7.A.6.c as it relates to drywell entry for the purpose of testing, surveillances or maintenance of equipment at power, to avoid thermal cycling of major plant components. We believe that the NRC-issued license amendment and its associated safety evaluation should be the governing documents. Accordingly, we interpret the phrase "important to safety" in Specification 3.7.A.6.c as being broader than just the safety-related set of equipment. The precise conditions under which drywell entry will occur will depend on the impact on nuclear safety and be governed largely by personnel access factors including

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(3) E. J. Mrocza letter to U.S. Nuclear Regulatory Commission, "Proposed Revision to Technical Specifications--Containment Systems," dated June 1, 1987.

(4) J. F. Stolz letter to E. J. Mrocza, "Proposed Revision to Technical Specifications--Containment Systems," dated April 11, 1989.

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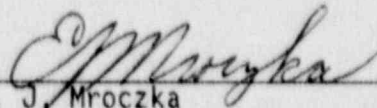
the purpose and duration of entry, exact location within the drywell, drywell temperature and ALARA considerations.

We will continue to interpret "important to safety" as summarized above in the specific instance of Specification 3.7.A.6.c, in the absence of any future communications from the NRC Staff on this matter. However, we reiterate our concern for the inconsistency this causes since we generally interpret "important to safety" as being synonymous with safety-related in other legally-binding documents.

If you have any questions, please feel free to contact my staff.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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E. J. Mroczka  
Senior Vice President

cc: W. T. Russell, Region I Administrator  
M. L. Boyle, NRC Project Manager, Millstone Unit No. 1  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3