

NORTHEAST UTILITIES



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

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October 15, 1980

Docket No. 50-245
B10106

Director of Nuclear Reactor Regulation
Attn: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

- References:
- (1) W. G. Council letter to D. M. Crutchfield dated May 9, 1980.
 - (2) R. F. Heishman (Region III) letter to L. Wachter (Northern States Power Company) dated December 13, 1979 (portions attached).
 - (3) W. G. Council letter to B. H. Grier (Region I) dated October 15, 1980, attached.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
Proposed Technical Specification Change for
Primary Containment Integrated Leak Rate Testing

Pursuant to 10CFR90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its operating license, DPR-21, by incorporating the attached changes into the Millstone Unit No. 1 Technical Specifications to completely supersede those proposed in Reference (1). The changes would revise the Technical Specifications concerning integrated containment leak rate testing (ILRT) to be consistent with the current Standard Technical Specifications for BWR's, NUREG-0123, Revision 2.

Our previous License Amendment Request of May 9, 1980 proposed ILRT criteria which would allow termination of the test in less than the currently specified 24-hour period. That request stated the shorter test would comply with 10CFR50 Appendix J, ANSI-N45.4-1972 and NUREG-0123. Since the ILRT is on the critical path for our current refueling, a reduction in the test duration can reduce the outage time. Savings in replacement power costs of several hundred thousand dollars can be realized for each ILRT if the test does not have to be continued to meet an arbitrary duration requirement.

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Following the original request (Reference (1)), we were informed by our licensing Project Manager in the Division of Operating Reactors and by other Staff members, that the unique version of our request would require extensive supporting evaluations to be submitted and that the Staff work load may not allow timely review and approval of the unique proposal, that has cost savings as its objective. Through these discussions and those with other BWR licensees, we became aware that the provisions in the BWR Standard Technical Specifications relating to containment integrated leak rate testing could be issued with little or no review required by the Staff.

Our proposed changes (attached) and the BWR Standard Technical Specification wording (Section 4.5.1.2 of NUREG-0123) requires the ILRT to conform to ANSI N45.4-1972. This ANSI Standard permits a test duration of less than 24 hours if the Office of Inspection and Enforcement inspector responsible for reviewing the ILRT approves the test results. The Region III Office of Inspection and Enforcement has established criteria for making this determination (Reference (2)). We have requested Region I to determine whether the same criteria can be established by them, which would be applicable to Millstone Unit No. 1 (Reference (3)).

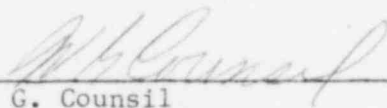
This change only applies to the administrative details of performing the ILRT in accordance with BWR Standard Technical Specifications. It does not involve significant new safety information of a type not previously considered in Staff safety reviews for similar BWR's and in development of Standard Technical Specifications. The safety evaluation considered the information discussed above and concluded this change does not involve a significant increase in the probability or consequences of an accident, does not involve a significant decrease in a safety margin, and, therefore, does not involve a significant hazards consideration. The off-site Nuclear Review Board has reviewed and concurred with this conclusion.

Pursuant to 10CFR170, a Class III (\$4,000) license amendment fee for this change was submitted with Reference (1). It was anticipated by NNECO at that time that a unique safety evaluation would have to be performed by the Staff. However, the Staff has not found it necessary to perform this unique evaluation for Millstone Unit No. 1 since as discussed above, it would require extensive supporting material from NNECO, and it was not possible to perform an expedited review due to Staff work load and priorities. Instead the alternative of a Standard Technical Specification became evident. It has been Staff practice to approve this identical change on other BWR's similar to Millstone Unit No. 1, as constituting an administrative change implementing a previously reviewed and approved action of the Commission. As such, NNECO concludes the applicable 10CFR170 fee should be \$1,400 (one thousand four hundred dollars) for this Class II Amendment proposed herein in lieu of Reference (1). Therefore, NNECO respectfully proposes to be reimbursed in the amount of \$2,600 (two thousand six hundred dollars), to compensate for overpayment for the Staff evaluation expected on this proposal.

Whether or not the Staff concurs with the reimbursement proposal, it is obvious that payment has been made to allow expedited processing of the license amendment request. Reload 7 is in progress and this proposed change would be very beneficial to us if it could be approved before November 28, 1980. Please contact us if you have any questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President

Attachment

STATE OF CONNECTICUT)

) ss. Berlin

Oct. 15, 1980

COUNTY OF HARTFORD)

Then personally appeared before me W. G. Council, who being duly sworn, did state that he is Senior 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. Dater
Notary Public

My Commission Expires March 31, 1981