

**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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March 18, 1991

Docket No. 50-336  
813645

Re: 10CFR50.90  
 10CFR50, Appendix R

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

Gentlemen:

- References:
- (1) S. E. Scace letter to U.S. Nuclear Regulatory Commission, "Licensee Event Report 90-001-00," dated February 9, 1990.
  - (2) E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Changes Suggested by Generic Letter 87-09," dated August 9, 1990.
  - (3) G. S. Vissing letter to E. J. Mroczka, "Issue of Amendment (TAC No. 77535)," dated February 26, 1991.

Millstone Nuclear Power Station, Unit No. 2  
Proposed Revision to Technical Specifications

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, DPR-65, by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit No. 2. The proposed changes to the Millstone Unit No. 2 Technical Specifications have been initiated to incorporate into the Technical Specifications additional fire detection and suppression systems resulting from various 10CFR50, Appendix R modifications, design changes, and other changes, as described in this submittal, consistent with fire protection guidelines and requirements. The proposed changes will bring the Technical Specifications into agreement with the equipment installed in the plant. The disagreement between the Technical Specifications and existing plant equipment was previously identified to the NRC Staff in Licensing Event Report (LER) 90-001-00, dated February 9, 1990 (Reference 1). The proposed Technical Specification changes are included as Attachment 1.

The proposed changes to each Technical Specification section are described below:

1. Index--Plant Systems

Index page VIII has been revised to reflect the addition of a new halon fire suppression system under Plant Systems Section 3/4.7.9. In addition, the page numbers for Section 3/4.7.10, Penetration Fire Barriers, and 3/4.7.11, Ultimate Heat Sink, have been changed to be consistent with the addition of this new fire suppression system.

2. Table 3.3-10, Fire Detection Instruments

a. Page 3/4 3-44

- 1) Under item No. 1, Containment, the fire zone (FLP 3-3) designation has been added to the East Penetration line item. In addition, for the West Penetration, the zone location has been corrected from (41) to (31) and the fire zone (FLP 3-7) designation has been added.
- 2) Under item No. 3, Cable Vaults and Areas, the Turbine Building Cable Vault (25') zone location has been revised from zone (21) to zone (22). Also, for this area the total number of channels has been increased from 9 to 34 and the minimum number of channels operable has been increased from 7 to 34. In addition, the zone location for the Lunch Room Cable Chase Area has been corrected from (40) to (24).
- 3) Under item No. 4, a correction was made to designate one of the DC Equipment Rooms as the "East" room. The zone locations for both the East and West DC Equipment Rooms and the 480 V East Switchgear Room have been revised. Also, the total number of channels and the minimum channels operable for both East and West DC Equipment Rooms have been increased to 6 each.

In addition, two new areas, the East and West Cable Vault Ventilation Openings, have been added to this item.

b. Page 3/4 3-45

- 1) Under item No. 7, Diesel Generators, the zone locations for both diesel locations have been revised. In addition, this item now reflects the removal of the single smoke detector channel for each diesel and now includes the addition of 8 heat detectors for each diesel area.

- 2) Under item No. 8, Main Exhaust Equipment Room, a revision has been made to now include the B52 Enclosure and to increase the total number of channels and minimum channels operable of the smoke detectors to 3 each.
- 3) Under item No. 9, Auxiliary Building, a third Safe Guards Room, designated as "C," has been added. In addition, the total number of smoke detector channels for "B" Safe Guards Room has been increased from 1 to 2.
- 4) Under item No. 11, Containment Building, the fire zone designations have been added to each RCP listed area.
- 5) Under item No. 12, Auxiliary Building, the total number of smoke detector channels for the Auxiliary Building elevation (-5') has been decreased from 14 to 13 to reflect actual plant configuration. No hardware changes are associated with this change as this is an original as-built condition. This change corrects this specification to reflect the actual number of detectors.

c. Page 3/4 3-45a

This is a new page that has been added to account for the addition of three instrument systems for the following areas; new item No. 13, Hydrogen Seal Oil; new item No. 14, Intake Structure; and new item No. 15, Motor Driven Aux. Feed Pump Room.

3. Section 3.7.9.2--Spray and/or Sprinkler Systems

- a. Under Section 3.7.9.2.c, Cable Vault (Aux. Building), item 1 was revised to indicate that the sprinkler system is an "in-tray" system and item 2 was revised to indicate that the deluge system is a ceiling level sprinkler system.
- b. Section 3.7.9.2.d, Cable Vault (Turbine Building), has been revised to specify the two specific systems in this area by now listing them separately.
- c. Three new systems have now been added to the list of Section 3.7.9.2 and designated as new items n, o, and p. This incorporates three additional areas in the Auxiliary Building into this specification. These three new systems are located in the Auxiliary Building at MCC B-61, the Charging Pump Cubicle and the Auxiliary Building general area.

4. Table 3.7-2, Fire Hose Stations

On this table, all of the hose station numbers for the various locations have been revised to reflect the new station numbering system. In addition, for hose station number 244-245, the location elevation has been corrected from 22'0" to -22'0".

5. Section 3.7.9.4--Halon Fire Suppression System

This is a new specification that has been added to incorporate the installation of a halon fire suppression system into the East and West D.C. Switchgear Rooms. The text of this new specification is now located on page 3/4 7-41.

The addition of this specification has resulted in the renumbering of the pages of the subsequent specifications as follows:

- a. Section 3.7.10, Penetration Fire Barriers, previously on page 3/4 7-41 is now on pages 3/4 7-42 and 3/4 7-43.
- b. Section 3.7.11, Ultimate Heat Sink, previously on page 3/4 7-42 is now on page 3/4 7-44.

Additionally, Specification 3.7.10 has been carried over onto two pages where previously all of this specification was on one. This was done to accommodate the addition of a new specification 3.7.9.4 and to correct an overcrowding problem with the existing text. Only the above page numbers have been changed. No change to the content of these specifications has been made.

6) Section 6.9 - Special Reports

Section 6.9.2.f has been revised to now include the new Halon fire suppression system, Specification 3.7.9.4.

7) Additional Changes

In a letter dated August 9, 1990 (Reference 2), NNECO submitted proposed changes to the Millstone Unit No. 2 Technical Specifications in response to Generic Letter 87-09. These changes were approved and recently issued by the NRC Staff as License Amendment No. 151 (Reference 3). This newly issued license amendment includes changes that affected, among others, Specifications 3.7.9.2 and 3.7.10 by deleting the reference to the provisions of Specification 3.0.4. Those changes have been included in this submittal to the extent that the new Specification 3.7.9.4, being added by this submittal, maintains consistency with License Amendment No. 151 by not including a reference to the provisions of Specification 3.0.4.

### Safety Evaluation

The proposed changes to the Millstone Unit No. 2 Technical Specifications have been initiated to incorporate into the Technical Specifications additional fire detection and suppression systems resulting from various 10CFR50, Appendix R modifications, design changes, and other changes, as described in this submittal, consistent with fire protection guidelines and requirements.

NNECO has reviewed these changes with respect to any potential impacts on design basis accidents. Operation of either sprinkler or halon suppression systems is not assumed either as an initiating event or as a result of a design basis accident. Additionally, the new detection and suppression systems reduce the likelihood of a failure of a safety system due to a fire. Thus, the changes associated with the sprinkler or halon suppression systems have no impact on design basis accidents. The remaining changes are clarifications or corrections and do not affect the current coverage or operability status of the fire detection or suppression systems to fulfill their primary design functions.

These changes will bring the Technical Specifications into agreement with the systems currently installed in the plant as a result of 10CFR50, Appendix R modifications and with the surveillance procedures used to verify operability. The addition of new fire detection and suppression systems offer greater coverage and provide enhanced capability of automatically controlling and/or extinguishing fires. Based on the above, it is concluded that these changes will not adversely affect the operability and reliability of the fire detection and suppression systems at Millstone Unit No. 2 and that no design basis analyses are affected by these changes.

NNECO has reviewed the proposed changes in accordance with the requirements of 10CFR50.92 and has concluded that the proposed changes do not involve a significant hazards considerations in that these changes would not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously analyzed. The proposed changes offer greater coverage and provide for an enhanced capability for automatically controlling and/or extinguishing postulated fires and actually increase the level of fire protection for the plant. Consequently, the changes do not adversely affect the probability or consequences of any design basis accident and therefore previously analyzed accidents are not affected.
2. Create the possibility of a new or different kind of accident from any previously analyzed. The proposed changes will increase the plants capability to detect, control, and extinguish fires. No new failure modes are introduced which would create the possibility of a new or different kind of accident.

3. Involve a significant reduction in a margin of safety. The proposed changes do not have any adverse impact on any protective boundary. Since the proposed changes also do not affect the consequences of any accident previously analyzed, there is no reduction in any margin of safety.

Moreover, the Commission has provided guidance concerning the application of the standards set forth in 10CFR50.92 by providing certain examples (March 6, 1986 51FR7751) of amendments that are considered not likely to involve a significant hazards consideration. These proposed changes are enveloped by example (ii), a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications, because these changes increase the numbers of fire detector instruments required to be operable and add systems to the Technical Specifications which were not previously included. These changes result in an increase in the level of fire protection at the plant and consequently do not involve a significant increase in the probability or consequences of an accident previously analyzed. The additional changes also included in this license amendment request are being made to correct errors in the current specifications and to maintain consistency with those changes made in response to Generic Letter 87-09. These changes are administrative in nature and consequently do not involve a significant increase in the probability or consequences of an accident previously analyzed. Therefore, the proposed changes do not increase the consequences of any event previously analyzed.

Based upon the information provided in this submittal, there are no significant radiological or nonradiological impacts associated with these proposed changes, and these proposed changes will not have a significant effect on the quality of the human environment.

The Millstone Unit No. 2 Nuclear Review Board and the Millstone Nuclear Power Station Site Nuclear Review Board has reviewed and approved the proposed amendment and concurred with the above determination.

In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of the proposed amendment.

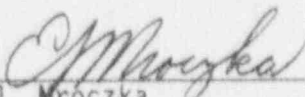
With respect to the schedule for issuance of this proposed license amendment, this license amendment may be processed on a routine basis with the amendment to be implemented within 30 days.

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We trust you will find this information satisfactory, and we remain available to answer any questions you may have.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

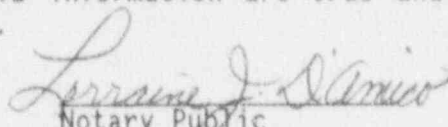
  
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E. J. Mroczka  
Senior Vice President

cc: T. T. Martin, Region I Administrator  
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2,  
and 3

Mr. Kevin McCarthy  
Director, Radiation Control Unit  
Department of Environmental Protection  
Hartford, CT 06116

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

Then personally appeared before me, E. J. Mroczka, 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 Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

  
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Notary Public  
My Commission Expires March 31, 1993