

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
WOLYONK WATER POWER COMPANY  
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March 12, 1993

Docket No. 50-245  
B14396

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1  
Proposed Revision to Technical Specifications  
Drywell to Suppression Chamber Differential Pressure

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License No. DRP-21 by incorporating the change identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 1.

### Background

In a letter dated June 15, 1992,<sup>(1)</sup> the NRC Staff issued Amendment No. 57 to the operating license of Millstone Unit No. 1, in response to our application dated April 13, 1992.<sup>(2)</sup> The amendment changed the technical specifications as recommended in NUREG-0737 and as detailed in Generic Letter 83-36. These changes pertain to containment high-range radiation monitors, containment pressure monitors, and containment water level monitors. In addition, the amendment changed each subsection of Section 3.7.A, Containment Systems, to include its own specific limiting condition for operation (LCO) rather than having an overall requirement at the end of Section 3.7.A. The action associated with LCO 3.7.A.2.a(4) was, however, overlooked. As such, LCO 3.7.A.2.a(4) continues to reference Subsection 3.7.A.7 which was formerly the overall LCO for Section 3.7.A. Subsection 3.7.A.7 was modified by the above-

(1) J. W. Andersen letter to J. F. Opeka, "Issuance of Amendment (TAC No. M54545)," dated June 15, 1992.

(2) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Generic Letter 83-36, TMI Technical Specifications--Containment High-Range Radiation Monitors - NUREG-0737, Item II.F.1.3--Containment Pressure Monitors - NUREG-0737, Item II.F.1.4--Containment Water Level Monitors - NUREG-0737, Item II.F.1.5," dated April 13, 1992.

ADD

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mentioned license amendment to reflect the LCO for containment high-range radiation monitors.

#### Description of Proposed Changes

The proposed change identified in Attachment 1 replaces the reference to subsection 3.7.A.7 in LCO 3.7.A.2.a(4) with a specific requirement to initiate an orderly shutdown if the provisions of 3.7.A.2.a(1) and (2) cannot be met.

Specifically, the statement "initiate an orderly shutdown and have the reactor in the COLD SHUTDOWN or REFUEL CONDITION within 24 hours," will replace "the provisions of 3.7.A.7 shall apply" in LCO 3.7.A.2.a(4).

The proposed change maintains the original intent of the reference to subsection 3.7.A.7 by requiring that an orderly shutdown be initiated and the reactor placed in the COLD SHUTDOWN or REFUEL CONDITION within 24 hours unless the drywell to suppression chamber differential pressure is restored to greater than or equal to 1.0 psid.

It is noted that this change is purely administrative in nature, as requirements are neither being added nor deleted. The proposed change corrects an administrative oversight. The action to be taken if the provisions of 3.7.A.2.a(1) and (2) cannot be met are being incorporated directly rather than having a reference to the appropriate action. To ensure that other references were not inadvertently overlooked, NNECO has reviewed Section 3.7.A and has confirmed that all other references are appropriate as written.

#### Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed change and has concluded that it does not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed change does not involve a SHC because the change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change corrects an administrative oversight and no requirements are being added or deleted. The proposed change incorporates the action to be taken if the provisions of LCO 3.7.A.2.a(1) and (2) cannot be met into LCO 3.7.A.2.a(4). This change is necessary because the current action statement incorrectly references Subsection 3.7.A.7 which is the action statement for containment high-range radiation monitors. As such, the change has no adverse affect on the LCOs or the surveillance requirements. In addition, no design basis accidents are affected by this change. Therefore, there is no impact on the probability of occurrence or the consequences of any design basis events. No safety systems are adversely affected by the change. No

failure modes associated with the change are identified. Previous analyzed accidents are not affected.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

The change incorporates the action to be taken if LCO 3.7.A.2.a(1) and (2) cannot be met into LCO 3.7.A.2.a(4). No requirements are being added or deleted.

Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created. There is no impact on plant response to the point where it can be considered a new accident, and no new failure modes are introduced. Furthermore, this administrative change clearly has no impact on safety limits or design basis accidents and it has no potential to create a new or unanalyzed event.

3. Involve a significant reduction in a margin of safety.

The proposed change is administrative in nature and no requirements are being added or deleted. As such, the change does not directly affect any protective boundaries nor does it impact the safety limits for the boundary. Thus, there are no adverse impacts on the protective boundaries, safety limits, or margins of safety.

The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are considered not likely to involve a SHC. The change proposed herein is enveloped by Example (i), a purely administrative change to the technical specifications to incorporate the action to be taken if LCO 3.7.A.2.a(1) and (2) cannot be met into LCO 3.7.A.2.a(4). The current action statement incorrectly references Subsection 3.7.A.7 (which was changed by License Amendment No. 57). No requirements are being proposed or deleted. As described above, the proposed change does not constitute a SHC since the proposed change is strictly administrative in nature. There is no impact on the probability or consequences of any design basis accidents nor are any new accidents created. There is also no reduction in any margin of safety.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not increase the types and amounts of effluents that may be released off site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed change meets the criteria delineated in 10CFR51.22(C)(9) for a categorical exclusion from the requirements for an environmental impact statement.

The Millstone Unit No. 1 Nuclear Review Board has reviewed and approved the attached proposed revision and concurs with the above determinations.