

**NORTHEAST UTILITIES**



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

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August 12, 1982

Docket No. 50-245  
50-336  
A02534

Director of Nuclear Reactor Regulation  
Attn: Robert A. Clark, Chief  
Operating Reactors Branch #3  
Mr. Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

- References:
- (1) E. L. Conner letter to W. G. Council, dated May 28, 1982.
  - (2) W. G. Council letter to D. M. Crutchfield and R. A. Clark, dated May 14, 1982.
  - (3) B. K. Grimes letter to All Power Reactor Licensees, dated July 11, 1978.
  - (4) W. G. Council letter to D. L. Ziemann and R. Reid, dated March 13, 1979.

Gentlemen:

Millstone Nuclear Power Station, Unit Nos. 1 and 2  
Proposed Revisions to Technical Specifications  
Radiological Effluent Technical Specifications

Reference (1) made application for amendments to Northeast Nuclear Energy Company (NNECO) Provisional Operating License DPR-21 and Facility Operating License DPR-65 for Millstone Unit Nos. 1 and 2, respectively, to revise the limits on liquid radioactive effluents from an activity basis to a dose basis and to add additional monitoring requirements for the releases from the Millstone Unit No. 2 condensate polishing facility. The corresponding license amendments issued in Reference (2) implemented a portion of the Radiological Effluent Technical Specifications (RETS) on an interim basis pending submission of a license amendment application for the remaining RETS. NNECO committed to provide this license amendment application to the NRC Staff by August 10, 1982.

In fulfillment of the commitment, pursuant to 10CFR50.90, NNECO hereby proposes to amend its operating licenses, DPR-21 and DPR-65 for Millstone Unit Nos. 1 and 2, respectively, by incorporating the attached RETS into each Unit's Safety Technical Specifications. The proposed technical specifications provide reasonable assurance that the requirements of 10CFR50, Appendix I are implemented at the Millstone Nuclear Power Station. The revised pages are included as Attachments 1 and 2 for Millstone Unit Nos. 1 and 2, respectively, and revise those provided in Reference (4).

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The Offsite Dose Calculation Manual common to both operating Units at the Millstone site is complete and will be forwarded under separate cover, shortly.

Pursuant to Section 5.6.3 of the Millstone Unit Nos. 1 and 2 Environmental Technical Specifications (ETS), NNECO hereby proposes to delete those sections of the ETS identified in Attachment 3. The requirements of the ETS Sections listed in Attachment 3 are proposed to be incorporated into the Appendix "A" Safety Technical Specifications through the RETS and would therefore be superfluous.

NNECO intends to propose later replacing the remaining ecological monitoring Technical Specifications of the ETS with an Environmental Protection Plan. This action will be taken since ecological monitoring requirements are under the jurisdiction of the U. S. Environmental Protection Agency (EPA) as established by the Atomic Safety and Licensing Appeal Board ruling of December 27, 1978 (Yellow Creek, ALAB-515). NNECO will prepare an environmental protection plan for the Millstone Site and application for the deletion of the remaining Appendix B Environmental Technical Specifications will be the subject of future correspondence.

Implementation of the proposed RETS for both Millstone Unit Nos. 1 and 2 will involve numerous procedure revisions and in many cases new procedures will be required to be written and approved. Plant personnel training and equipment recalibration will also be necessary prior to the use of the attached technical specifications. In addition, the reporting periods over which radiological effluents are recorded correspond to calendar quarters. As such, NNECO proposes the implementation schedule provided in Attachment 4 for putting the RETS into effect at both Units. This schedule also provides the date at which time the corresponding ETS section would be deleted. It is our understanding that this approach is acceptable to the NRC Staff.

The proposed changes provided as Attachments 1 and 2 are the culmination of several meetings and telephone conversations with the NRC contractor Franklin Research Center, joint NRC Staff/AIF meetings as well as extensive in-house review by Plant and Site Operations Review Committees and the Corporate Nuclear Review Boards. They represent acceptable Technical Specifications through which the requirements of Appendix I to 10CFR50 will continue to be implemented at Millstone Unit Nos. 1 and 2. As a result of the in-house reviews, portions of the proposed RETS have been revised from that provided to you through Franklin Research Center on April 5, 1982. In particular, NNECO notes that the section in both the Millstone Unit Nos. 1 and 2 Administrative Control Technical Specifications dealing with the Process Control Program, originally Section 6.16, is not proposed. The Process Control Program (PCP) at the Millstone Nuclear Power Station consists of those procedures dealing with the waste solidification process. They are no different than any other plant operating procedure and NNECO intends to treat them as such. Changes to these procedures, and therefore, to the PCP, are made in accordance with Technical Specification 6.8.2. Any additional controls on specific plant procedures are not considered necessary or appropriate and are not proposed.

Technical Specification 3.8.B for Millstone Unit No. 1, Mechanical Condenser Vacuum Pump, has been relocated to Section 3.6.K to more appropriately reflect the system of which it is a part. Specification 3.7.B.6 has been added to incorporate the requirements of Environmental Technical Specification 2.4.2.2.I as this section of the ETS is proposed to be deleted.

Specification 3.11.2.5 and portions of other specifications relating to the waste gas holdup system oxygen monitor for Millstone Unit No. 2 are not proposed as instrumentation does not currently exist for the intended purposes. It is NNECO's understanding that the NRC Staff is currently evaluating this requirement. Upon resolution of this matter, NNECO will make application for the appropriate Technical Specification changes.

The attached proposed changes have been reviewed pursuant to 10CFR50.59 and have not been found to constitute an unreviewed safety question.

The Millstone Unit Nos. 1 and Unit No. 2 Nuclear Review Boards, the Millstone Site Nuclear Review Board, and the Millstone Environmental Review Board have reviewed and approved the above proposed changes, and concurred in the above determination.

Concerning the requirements of 10CFR170, as indicated by the NRC Staff in Reference (3), this amendment constitutes a Class III amendment. Since a separate review of these specifications will be necessary for each of the two Millstone Units, payment in the amount of \$8,000 (eight thousand dollars) is appropriate.

NNECO has previously provided this amount in accordance with our original RETS application of Reference (4); NNECO considers the fee provided with Reference (4) as payment for this license amendment request.

Notwithstanding the proposals contained herein to modify the Technical Specifications as shown in the Attachments, NNECO wishes to identify to the NRC Staff a concern regarding the volume and content of Safety Technical Specifications. If the Attachments were issued in the form of a license amendment as proposed, some 50 new pages containing hundreds of additional requirements would become part of each unit's license. The administration of these requirements would involve numerous procedure additions, and revisions, and consume thousands of additional man-hours on an annual basis.

On March 30, 1982, the Commission published a proposed rule in the Federal Register (47FR13369) regarding proposed changes to the Technical Specifications for Nuclear Power Reactors. In the Supplementary Information Section of the proposed rule, the Commission stated:

"that the increased volume of Technical Specifications lessens the likelihood that licensees would focus attention on matters of more immediate importance to safe operation of the facility."

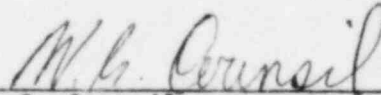
In my comment letter addressed to Mr. Chilk dated May 28, 1982 on this subject, NNECO enthusiastically supported the concepts of the proposed rule and expressed agreement with the above quoted concern. The letter further noted that the RETS issue is one example where the NRC is in the midst of implementing major new additions to the scope of already excessive Technical Specifications.

In sum, NNECO believes that there may exist a more resource-effective means of accomplishing the objectives of the RETS. One such alternative consists of including only a general statement of objectives within Appendix A and specifying the detailed requirements in licensee controlled documents. This alternative would be in full accord with the objectives of the referenced rulemaking proceeding. It would assure conformance with the requirements of 10CFR50 Appendix I and could be achieved within the confines of the existing 10CFR50.36. It offers the significant advantage of minimizing the number of license amendments required in the future for insignificant reasons; a feature which would result in more effective utilization of resources within both of our respective organizations. It reduces the possibility that LER's will be generated for insignificant reasons, thereby enabling operations personnel to focus on matters of greater safety significance.

For these reasons, NNECO respectfully requests that this concept be explored between our respective Staff's at this stage to assure that the volume and content of Technical Specifications is optimized. NNECO will be maintaining communications with the NRC Project Manager to pursue this alternative.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council  
Senior Vice President

cc: V. Stello, Jr.

