

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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January 14, 1994

Docket No. 50-245
B14626

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
Standby Liquid Control System

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

Background

The requirement in Technical Specification Limiting Condition for Operation (LCO) 3.4.D, "Standby Liquid Control System, Shutdown Requirement," states that if Specifications 3.3.A through C are not met, an orderly shutdown shall be initiated. The reference to Specifications 3.3.A through C is incorrect. Section 3.4.D should refer to the operating requirements in Section 3.4 (i.e., 3.4.A through C). This reference has been incorrect since the Technical Specifications were originally issued.

In addition to the change to the Technical Specifications, the Bases are being clarified. Currently, the Bases does not state which specific solution of sodium pentaborate is used. Different solutions containing sodium pentaborate may have different concentrations, therefore, the chemical solution will be specified by full chemical formula.

The Bases also contains an excerpt from 10CFR50.62. This section of 10CFR50.62 was updated in 1989.⁽¹⁾ This license amendment request updates the excerpt in the Bases so that it reflects the current text of the regulation.

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(1) 54 FR 13362, dated April 3, 1989.

ADD 1/1

Description of Proposed Changes

The reference in LCO 3.4.D on page 3/4 4-4 of the Millstone Unit No. 1 Technical Specifications is being changed from "3.3.A through C" to "3.4.A, 3.4.B, and 3.4.C."

Bases section 3.4.A, "Standby Liquid Control System, Normal Operation," on page B 3/4 4-1 is being revised to state the chemical formula for the sodium pentaborate solution used and to clarify the LCO minimum solution concentration requirement of 11 weight percent. Also included is an update to the excerpt from 10CFR50.62 to reflect the current text of the regulation.

Attachment 1 provides a markup of the proposed changes, whereas Attachment 2 provides retyped pages of the Millstone Unit No. 1 Technical Specifications.

Safety Assessment

This change is proposed to correct an editorial error. Presently, if Specification 3.4.A, 3.4.B, or 3.4.C cannot be met, an orderly shutdown is initiated. This ensures that the reactor is placed in a safe condition. As currently written, deviating from the operating requirements of Technical Specification, Section 3.4, "Standby Liquid Control System," does not require any Technical Specification initiated action. Correcting the reference in Section 3.4.D will ensure that the Technical Specifications reflect the correct and conservative actions which are currently practiced. Technical Specification 3.3 already has shutdown requirements defined.

Revision to Bases Section 3.4 will ensure that a boron solution of sufficient concentration to maintain the standby liquid control system at the proper weight percentage of boron is identified.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the 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 an SHC because the change would not:

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

The proposed change only modifies an incorrect reference in Section 3.4.D of the Technical Specifications. In practice, if Specification 3.4.A, 3.4.B, or 3.4.C cannot be met, an orderly shutdown is initiated. As currently written, the failure to meet the requirements of Section 3.3 would also initiate a shutdown in accordance with Section 3.4.D. This is not the intent of Section 3.4.D since Section 3.3 already has specific shutdown requirements. This proposed change will correct Section 3.4.D so that it limits the conditions under which a plant shutdown must be

initiated to the LCOs of the standby liquid control system. Therefore, this proposed change will not increase the probability or consequences of an accident.

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

The proposed change corrects an incorrect section reference. There is no change to the operation or design of the plant, nor is there any change to the operability requirements of either section. The proposed change properly identifies the conditions under which the plant must be shut down if a LCO is not met for the standby liquid control system. In practice, if Specification 3.4.A, 3.4.B, or 3.4.C cannot be met, an orderly shutdown is initiated. Since there is no change in plant operation or design, there is no possibility of a different kind of accident.

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

The proposed change does not modify the design or function of the plant, nor does it reduce operability requirements of either Section 3.3 or 3.4. The proposed change only corrects an incorrect section reference by identifying the correct shutdown requirements for the standby liquid control system. Since there is no change to plant operation or design and the shutdown requirements are not reduced, there is no reduction in the margin of safety.

The Commission has provided guidance concerning the application of the standards of 10CFR50.92 by providing certain examples (51 FR 7751, March 6, 1986) of amendments that are not considered likely to involve an SHC. The changes to the technical specifications proposed herein are enveloped by example (i). The change to Section 3.4.D is a correction of an error (i.e., an incorrect reference) and does not modify the design or function of the plant, nor does it reduce operability requirements of either Section 3.3 or 3.4. The proposed change only corrects an incorrect section reference by identifying the correct shutdown requirements for the standby liquid control system.

The proposed changes in the Bases are clarifications to ensure consistent application of the requirements specified in Section 3.4.

Environmental Considerations

NNECO has reviewed the proposed licensed 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 offsite, 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.

U.S. Nuclear Regulatory Commission
B14626/Page 4
January 14, 1994

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

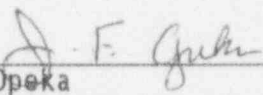
In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this amendment.

NNECO does not have a specific schedular requirement for the issuance of this change and, as such, it can be processed at the Staff's convenience. We request that the change be effective upon issuance, with implementation within 60 days.

If you have any questions, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY




J. F. Opoka
Executive Vice President

cc: T. T. Martin, Region I Administrator
J. W. Andersen, NRC Acting Project Manager, Millstone Unit No. 1
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Mr. Kevin T.A. McCarthy, Director
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Subscribed and sworn to before me

this 14 day of January, 1994



Date Commission Expires: 3/31/98