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NORTHEAST UTILITIES



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

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January 8, 1979

Docket No. 50-336

Director of Nuclear Reactor Regulation
Attn: Mr. R. Reid, Chief
Operating Reactors Branch #4
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

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

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its operating license, DPR-65, by incorporating the following proposed revisions into the Millstone Unit No. 2 Technical Specifications:

Revise Section 3/4.7.8, Hydraulic Snubbers, and Table 3.7-1 as shown in Attachment 1.

This change proposes to delete the generic applicability statement which requires the hydraulic snubbers listed in Table 3.7-1 to be operable while the plant is in Modes 1 through 4. As an alternative, a new column has been added to Table 3.7-1 which provides the specific modes of operation for which snubber operability is actually required. Similarly, the single ACTION statement, which requires the plant to be in HOT STANDBY within 72 hours and in COLD SHUTDOWN within the following 30 hours in the event of an inoperable snubber, has been deleted and replaced with the six more appropriate ACTION statements listed on Page 3/4 7-29. The deletion of these overly restrictive generic requirements will allow greater operating flexibility during the repair and/or maintenance of safety-related hydraulic snubbers, without compromising plant safety. The philosophy employed in developing this proposed change was based extensively on a review of the modes for which the plant system involved is required to be operable by Technical Specifications. This concept is explained below.

The safety-related snubbers can be grouped into the following eleven (11) categories:

- (1) High Pressure Safety Injection (HPSI)
- (2) Low Pressure Safety Injection (LPSI)
- (3) Containment Spray (CS)
- (4) Shutdown Cooling (SDC)
- (5) Safety Injection Tanks (SIT)
- (6) Spent Fuel Pool (SFP)

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- (7) Reactor Building Closed Cooling Water (RBCCW)
- (8) Service Water (SW)
- (9) Steam Generators (SG)
- (10) Feedwater System (FEED)
- (11) Main Steam (MS)

Justification for the applicable modes and action statements are provided below for each category.

(1) High Pressure Safety Injection

No change. These snubbers are required to be operable in Modes 1 through 4 as under the present requirements. In the event of an inoperable snubber, ACTION statement 1 is required which, in this case, is also the same as the present specifications.

(2) Low Pressure Safety Injection

LPSI system snubbers are required to be operable in Modes 1, 2, 3(+), and 6. The LPSI system as an ECCS subsystem is required to be operable in Modes 1, 2, and 3 (with the pressurizer pressure ≥ 1750 psia designated by (+)) by Limiting Condition for Operation (LCO) 3.5.2. Also, some snubbers designated as part of the LPSI system are common to the Shutdown Cooling system and are, therefore, required to be operable in Mode 6. ACTION statement 4 identifies the appropriate action to be taken in the event of an inoperable snubber depending on the plant's operating mode.

(3) Containment Spray

LCO 3.6.2.1 requires two operable containment spray systems in Modes 1, 2, and 3(+). The applicable modes for snubber operability have been revised accordingly. ACTION statement 1 requires that the plant ultimately be in a mode not requiring snubber operability if the snubber cannot be restored to OPERABLE status.

(4) Shutdown Cooling

LCO 3.9.8 requires that a SDC loop be operable in Mode 6. The operability of SDC snubbers listed in Table 3.7-1 has been changed to reflect the required operability of the Shutdown Cooling System itself. The ACTION statement for inoperable SDC snubbers (No. 3) is similar to the action required in the event of an inoperable Shutdown Cooling System as in LCO 3.9.7.

(5) Safety Injection Tanks

The operability requirements of SIT snubbers have been revised to conform to the requirements of the SIT system itself, specifically, Modes 1, 2, and 3(+). (See LCO 3.5.1). ACTION statement 1 requires that the plant ultimately be in a mode not requiring snubber operability if the snubber cannot be restored to OPERABLE status.

(6) Spent Fuel Pool

Spent fuel pool cooling is not required unless irradiated fuel assemblies are in the storage pool. ACTION statements 5 and 6 have been written to specifically respond to the inoperability of the three SFP snubbers listed in Table 3.7-1.

(7) Reactor Building Closed Cooling Water

No change.

(8) Service Water

No change.

(9) Steam Generators

LCO 3.4.5 requires each steam generator to be operable in Modes 1, 2, and 3. The applicable modes for the steam generator snubbers have been revised accordingly. ACTION statement 1 requires that the plant ultimately be in a mode not requiring snubber operability.

(10) Feedwater System

The snubbers on feedwater lines, in general, are required to be operable in Modes 1, 2, and 3, unless the line containing the hanger is isolated from the affected steam generator. The ACTION statement for these snubbers (No. 2) allows the isolation of the line containing the hanger from the affected steam generator or, the plant must be in a MODE not requiring operability of the snubber. For certain feedwater snubbers, it has been determined that the snubbers are required to be operable regardless of whether the line is isolated from the steam generator; the inoperability of these snubbers could affect other lines. Therefore, these snubbers are required to be operable in Modes 1 through 3 and ACTION statement 1 is applicable.

(11) Main Steam

As described above under "Feedwater System", the snubbers on main steam lines are similarly required to be operable in Modes 1, 2, and 3, unless the line containing the hanger is isolated from the affected steam generator. Again, certain snubbers are required to be operable regardless of whether the line is isolated from the steam generator. The ACTION statements are the same as for the Feedwater System snubbers.

It is emphasized that although in most cases, snubber operability requirements are proposed to be relaxed, plant safety is not compromised. This is most readily demonstrated by the fact that the mode applicability determination and action statement wording is based upon the LCO for the plant system or component under consideration. A hydraulic snubber on a plant system is clearly not as vital as the system itself.

In addition to the above described revisions to the applicability modes and action statements, this review has resulted in several non-safety related snubbers being identified and, therefore, deleted from Table 3.7-1. The snubbers which have been deleted and the justification for the deletion are provided below.

I.	<u>HANGER NO.</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATION, AND ELEVATION</u>
	411010	FEED-E/22/+41
	413021	MS-D/16/+43
	413036	MS-E/18/+48
	413039	MS-E/21/+49
	490001(2)	MS-D/19/+28
	490002(2)	MS-D/19/+25
	490003(2)	MS-C/19/+27
	490004(2)	MS-D/19/+25
	490005(2)	MS-C/19/+33
	490006	MS-D/19/+33
	490007	MS-D/19/+32
	490008	MS-C/19/+32
	490018(2)	MS-D/17/+33
	490019	MS-D/17/+33
	490031	MS-B/17.1/+46
	511001	FEED-D/22/+37
	51119-R27(2)	MS-D/17/+45
	51119-R28(2)	MS-B/17/+45
	51119-C29	MS-D/17/+45

The above snubbers are installed on Main Steam and Feedwater Lines which are both designed to the requirements of seismic category II piping. For these lines in these areas, the only safety concern is that the postulated failure of these lines during a seismic event not affect the performance of any safety-related equipment. In each of these areas, this protection is provided by pipe whip restraints which provide far greater assurance of the integrity of these lines as they affect safety related systems during a seismic event.

II.	<u>HANGER NO.</u>	<u>SYSTEM SNUBBER INSTALLED ON, LOCATIONS, AND ELEVATION</u>
	310022	HPSI-46S/21E/-7
	427115(2)	SW-L.5/15.9/-14

These snubbers are mechanical snubbers, which have been inadvertently included in the specifications for hydraulic snubbers.

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

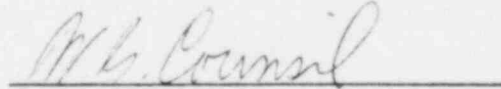
The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved the above proposed changes, and concurred in the above determination.

NNECO has reviewed the above proposed license amendment pursuant to the requirements of 10CFR170, and has determined that the proposal constitutes a Class 3 amendment. Accordingly, enclosed herewith is payment in the amount of \$4,000

(Four Thousand Dollars). The basis for this determination is that the proposal involves a single safety issue which does not involve a significant hazards consideration.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Counsil", is written over a horizontal line.

W. G. Counsil
Vice President

Enclosure

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

Jan. 8, 1979

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

My Commission Expires March 31, 1981