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September 24, 1982

Docket No. 50-336 B10564

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

References: (1

- (1) R. W. Starostecki letter to W. G. Counsil, dated July 7, 1982.
- (2) W. G. Counsil letter to R. W. Starostecki, dated August 5, 1982.

Gentlemen:

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2 PROPOSED REVISIONS TO TECHNICAL SPECIFICATIONS BORIC ACID FLOW PATH REQUIREMENTS

Pursuant to 10CFR 50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, No. DPR-65, by incorporating the attached revisions into the Millstone Unit No. 2 Technical Specifications.

The proposed change is intended to clarify the requirements for boration system flow paths as utilized in reactivity control and emergency core cooling systems. The change modifies Technical Specification 3.1.2.2 to require both boric acid tanks and corresponding facility dependent flow paths to be operable in the modes in which operability is required for ECCS considerations. This change provides consistency between specification 3.1.2.2 and 3.5.2 of the Millstone Unit No. 2 Technical Specifications. The proposed license amendment fullfills the commitment made in Reference (2) in response to Reference (1).

All necessary reviews have been completed including the reviews pursuant to 10CFR50.59. NNECO has determined that the attached proposed license amendment does not constitute an unreviewed safety question.

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

These changes have been reviewed in accordance with the requirements of 10CFR170. NNECO has concluded that the proposed license amendment constitutes a Class II license amendment.

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The basis for this determination is that the proposed change is administrative in nature and has no safety or environmental significance. As such, please find enclosed the appropriate Class II license amendment fee of \$1200.00.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil

Senior Vice President