

Northeast Utilities Service Company P.O. Box 270 Hartford, CT 06141-0270 (203) 665-5000

April 12, 1994

Docket No. 50-336 B14773

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Electrical Power Systems

On December 17, 1993, Northeast Nuclear Energy Company (NNECO) submitted a proposal to amend Operating License DPR-65. (1) NNECO proposed to rewrite the action statements for the limiting conditions of operation (LCO) associated with Millstone Unit No. 2 Technical Specification 3.8.1.1. The proposed revisions are the results of lessons learned in response to the condition previously described in submittals dated April 28, 1993, (2) and July 26, 1993. (3) The intent of the proposed changes was to reduce the number of unloaded emergency diesel generator starts required to be performed to demonstrate operability in accordance with the LCOs of Technical Specification 3.8.1.1.

Recently, the NRC Staff had several comments regarding the proposed changes to Millstone Unit No. 2 Technical Specification 3.8.1.1. The intent of this submittal is to incorporate the comments discussed during a conference call on March 21, 1994, between the NRC Staff and NNECO representatives into the proposed revision to the Millstone Unit No. 2 Technical Specifications. These comments

⁽³⁾ J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Inspection Report No. 50-336/93-81, Reply to Notice of Violation," dated July 26, 1993.



⁽¹⁾ J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Electrical Power Systems," dated December 17, 1993.

⁽²⁾ S. E. Scace letter to the U.S. Nuclear Regulatory Commission, "Facility Operating License No. DPR-65, Docket No. 50-336, Licensee Event Report 93-007-00," dated April 28, 1993.

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were mutually acceptable. They included:

Revising action statements a, b, c, and e of Millstone Unit No. 2 Technical Specification 3.8.1.1 by including a requirement to be in HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours, if the applicable electrical power source cannot be restored to an OPERABLE status within the given time frame.

The previous proposal did not include the requirement to be in HOT STANDBY within 6 hours. It required the unit to be placed in COLD SHUTDOWN within 36 hours, if the applicable electrical power source could not be restored to an operable status within the given time frame.

- Revising action statement d of Millstone Unit No. 2 Technical Specification 3.8.1.1 by including a requirement to be in HOT STANDBY within 6 hours, if an offsite source cannot be restored to an OPERABLE status within 24 hours. Currently, the proposed action statement requires the unit to be in HOT SHUTDOWN within 4 hours, in the event that an offsite source cannot be restored to an OPERABLE status within 24 hours. This change in conjunction with the above change for action statements a, b, c, and e will ensure that the action to take if the applicable electrical power source cannot be restored within the given time period is consistent for each action statement.
- Correcting a typographical error in action statement d of Millstone Unit No. 2 Technical Specification 3.8.1.1. The action statement should read "...restore one of the inoperable offsite sources to OPERABLE status within 24 hours..." instead of "... restore one of the inoperable offsite sources to OPERABLE status with 24 hours..."

In addition to incorporating the comments discussed during the March 24, 1994, conference call, NNECO is proposing the following editorial changes:

- The originally proposed action statement c of Millstone Unit No. 2 Technical Specification 3.8.1.1 is missing a comma in the thirteenth line of the statement. NNECO is proposing to place a comma at the end of the word "appropriate" in the thirteenth line of action statement c.
- The originally proposed footnote referenced in action statements b and c of Millstone Unit No. 2 Technical Specification 3.8.1.1 was awkwardly phrased. NNECO is proposing to modify the footnote by replacing the phrase "to OPERABLE" with the phrase "to an OPERABLE status."

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Attachments 1 and 2 provide the revised marked-up and retyped Millstone Unit No. 2 Technical Specifications. These Attachments have been resubmitted in their entirety to facilitate review and issuance.

The safety assessment and significant hazards consideration provided in the submittal dated December 17, 1993, remain valid. These proposed changes have no impact on the technical content of the previous submittal.

This request, like the previous request made on December 17, 1993, is not necessary for continued plant operation. As such, no specific schedule for approval and issuance is requested. However, it is appropriate that the change become effective within 30 days of issuance of the license amendment.

In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this revision to the proposed amendment dated December 17, 1993.

Should the NRC Staff have any questions regarding this submittal, please contact R. H. Young at (203) 665-3717.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

J. F. Opeka

Executive Vice President

cc: T. T. Martin, Region I Administrator

G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3

Mr. Kevin T.A. McCarthy, Director Monitoring and Radiation Division Department of Environmental Protection 79 Elm Street P.O. Box 5066 Hartford, Connecticut 06102-5066 U.S. Nuclear Regulatory Commission B14773/Page 4 April 12, 1994

Subscribed and sworn to before me

this 12 day of april, 1994

Date Commission Expires: 3/31/98