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April 22, 1994

Docket No. 50-336
B14393

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
Remote Shutdown Monitoring Instrumentation

Introduction

Pursuant to 10CFR50.90 Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License No. DPR-65 by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit No. 2. The purpose of this proposed license amendment is to modify the indicated measurement range for the neutron flux monitor on the remote shutdown panel and correct a few typographical and administrative errors that currently exist in the Millstone Unit No. 2 Technical Specifications. Specifically, NNECO is proposing to modify Millstone Unit No. 2 Technical Specification Table 3.3-9 by eliminating the measurement range of 10^{-1} - 10^4 counts per second (CPS) for the entry regarding the "Wide Range Logarithmic Neutron Flux Monitor." Also, NNECO is proposing to correct a few typographical and editorial errors on page V of the Index for the Millstone Unit No. 2 Technical Specifications. A detailed discussion of these proposed changes is provided below. Attachments 1 and 2 present the marked-up and retyped technical specification pages, respectively.

Background

In the event of a forced evacuation from the control room, instrumentation and controls are available outside the control room on the hot shutdown panel (C-21) to permit the operators to maintain the plant in a hot shutdown condition. The operators would be able to bring the plant to a cold shutdown condition by utilizing panel C-21 in conjunction with local operation of certain equipment.

One of the variables which can be monitored at panel C-21 is wide range logarithmic neutron flux. The two wide range logarithmic neutron flux monitors located at panel C-21 are dual scale meters which may display both the neutron source power level in CPS and the operating power level in

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percent. The entry in Technical Specification Table 3.3-9 for the "Wide Range Logarithmic Neutron Flux Monitor" denotes that the measurement ranges are 10^{-1} - 10^4 CPS and $10^{-8}\%$ - 100% power.

During a channel check between the control room indication and panel C-21, the meter at panel C-21 did not meet the channel check criterion when the control room meter switch was placed in the CPS position. An investigation revealed that the C-21 meter does not receive a CPS input, even though the meter is supplied with a CPS scale and legend. A review of the original design drawings concluded that this arrangement is consistent with the original plant design. The original design drawings show that the wide range logarithmic neutron flux indicators only receive input to display an indication on the percent power scale. Therefore, the entry in Technical Specification Table 3.3-9 for the "Wide Range Logarithmic Neutron Flux Monitor" regarding the CPS measurement range is not needed. The principal purpose of this proposed license amendment is to make the Millstone Unit No. 2 Technical Specifications consistent with the plant design.

Description of Proposed Changes

NNECO proposes to modify the "Wide Range Logarithmic Neutron Flux Monitor" entry in Millstone Unit No. 2 Technical Specification Table 3.3-9 by eliminating the reference to a CPS scale (10^{-1} - 10^4) in the "measurement range" column. Also, NNECO proposes to correct a few typographical and editorial errors on page V of the Index.

Millstone Unit No. 2 Technical Specification Table 3.3-9 lists two ranges for the "Wide Range Logarithmic Neutron Flux Monitor" at panel C-21. The ranges are 10^{-1} - 10^4 CPS and $10^{-8}\%$ - 100% power. An investigation has determined that the original design of the wide range logarithmic neutron flux indicators was to only receive an input to display on the percent power scale. Therefore, NNECO is proposing to eliminate the range of 10^{-1} - 10^4 CPS from Table 3.3-9's entry for "Wide Range Logarithmic Neutron Flux Monitor."

Currently the Index does not include a reference to Millstone Unit No. 2 Technical Specification 3.3.3.5, "Remote Shutdown Instrumentation." NNECO is proposing to add a reference to the "Remote Shutdown Instrumentation" section of the technical specifications and its applicable page number (3/4 3-39) on page V of the Index.

NNECO is proposing to delete the reference to "Chlorine Detection Systems" from page V of the Index to the Millstone Unit No. 2 Technical Specifications. The technical specifications regarding the chlorine detection system were deleted in Amendment No. 127.⁽¹⁾

(1) D. H. Jaffe letter to E. J. Mroczka, "Issuance of Amendment (TAC Nos. 67040 and 66954)," dated March 28, 1988.

In addition, NNECO is proposing to correct several typographical errors on page V of the Index to the Millstone Unit No. 2 Technical Specifications. Currently, the columnar heading for page numbers is not underlined, NNECO proposes to replace the current heading with a heading that is underlined. Also, page V refers to Sections 3.4.2.3, 3.4.3.2, and 3.4.4, these references are incorrect. NNECO proposes to correct these references. The page should refer to Sections 3/4.2.3, 3/4.3.2, and 3/4.4.

Safety Assessment

NNECO's proposal to delete the CPS scale for the "Wide Range Logarithmic Neutron Flux Monitor" entry for Millstone Unit No. 2 Technical Specification 3.3-9 will not affect the ability of Millstone Unit No. 2 to meet the intent and purpose of panel C-21's original design. The 10⁻⁸% to 100% power scale overlaps the CPS scale, and provides adequate indication to bring the unit to a hot shutdown condition from outside the control room. Also, the instruments on C-21 are not used to provide the start-up rate signal during start-up or refueling operations. This proposed license amendment does not impact the performance of any safety-related equipment, system, or components.

A review of the original design drawings concluded that this proposed change is consistent with the original plant design, and it reflects the actual as-built condition of the unit. The original design drawings show that the wide range logarithmic neutron flux indicators only receive a percent power signal.

Also, the CPS scale would be inoperable even if the wide range logarithmic neutron flux indicators received a CPS input, since the manually-operated push button to power the second fission detector, which is required at the extreme low CPS end of the wide range instrument, is located in the control room and would be inaccessible.

Based on the above, NNECO concludes that this proposed license amendment will not have a negative impact on the health and safety of the public and is safe.

Significant Hazards Consideration

NNECO has reviewed the proposed changes in accordance with 10CFR50.90 and has concluded that the changes do 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 changes do not involve an SHC because the changes would not:

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

NNECO's proposal to eliminate the CPS scale for the "Wide Range Logarithmic Neutron Flux Monitor" entry in Millstone Unit No. 2 Technical Specification Table 3.3-9 will not affect the ability of Millstone Unit No. 2 to meet the intent and purpose of panel C-21's original design.

The $10^{-8}\%$ to 100% power scale overlaps the CPS scale. The range of $10^{-8}\%$ - 100% power for the "Wide Range Logarithmic Neutron Flux Monitor" is adequate to permit the operators to bring the unit to hot shutdown from outside the control room. Also, the instruments on C-21 are not used to provide the start-up rate signal during start-up or refueling operations. This proposed license amendment does not impact the performance of any safety-related component, system, or structure.

A review of the original design drawings concluded that this proposed change is consistent with the original plant design, and reflects the actual as-built condition of the unit. The original design drawings show that the wide range logarithmic neutron flux indicators only receive a percent power signal.

NNECO's proposals to rectify a few typographical and editorial errors on page V of the Index for the Millstone Unit No. 2 Technical Specifications are administrative in nature. They ensure that the Index accurately reflects the contents of the technical specifications.

Based on the above, the proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously analyzed.

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

The proposed license amendment does not impact the performance of any safety-related component, system, or structure. Panel C-21 is required to permit the operators to bring the unit to a hot shutdown condition from a location outside the control room. Deleting the CPS range for the "Wide Range Logarithmic Neutron Flux Monitor" does not affect the ability of the operators to accomplish this function. Also, the proposed change is consistent with the original design of the plant. The proposed license amendment cannot create the possibility of a new or different kind of accident from any previously analyzed.

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

NNECO's proposal to eliminate the CPS scale for the wide range logarithmic neutron flux monitors will not affect the ability of Millstone Unit No. 2 to meet the intent and purpose of panel C-21's original design. The $10^{-8}\%$ to 100% power scale overlaps the CPS scale. The range of $10^{-8}\%$ - 100% power for the "Wide Range Logarithmic Neutron Flux Monitor" is adequate to permit the operators to bring the unit to hot shutdown from outside of the control room. Also, the instruments on C-21 are not used to provide the start-up rate signal during start-up or refueling operations. This proposed license amendment does not impact the performance of any safety-related component, system, or structure.

Therefore, this proposed license amendment does not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51 FR 7751) of amendments that are considered not likely to involve an SHC. The proposed changes to rectify a few typographical and editorial errors on page V of the Index are enveloped by example (i), "a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature." The proposed change to delete the CPS range from the "Wide Range Logarithmic Neutron Flux Monitor" entry for Millstone Unit No. 2 Technical Specification Table 3.3-9 is not enveloped by any specific example. However, the previous discussions have demonstrated that this proposed change does not involve an SHC.

Environmental Consideration

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, do 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 changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

Nuclear Review Board Review

The Millstone Unit No. 2 Nuclear Review Board has reviewed the proposed amendment and has concurred with the above determination.

Proposed Schedule for License Amendment Issuance

This request is not necessary for continued plant operation and as such no specific schedule for approval and issuance is requested. However, it is appropriate that this change become effective within thirty days of issuance of the license amendment.

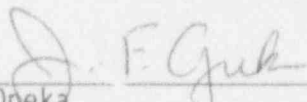
In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



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Subscribed and sworn to before me

this 22 day of April, 1994



Notary Public

Date Commission Expires: 12/31/94