

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NORTH FINE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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January 10, 1991

Docket No. 50-336
B13701

Re: Generic Letter 87-09

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Response to Request for Additional Information
Generic Letter 87-09 (TAC No. 77535)

By letter dated August 9, 1990,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) submitted an amendment request to the NRC Staff which would revise Technical Specifications of Millstone Unit No. 2. The proposed changes would revise Specifications 3.0.4, 4.0.3, and 4.0.4 and the Bases Sections associated with Specifications 3.0 and 4.0 in accordance with Generic Letter 87-09.

Subsequently, in a letter dated November 8, 1990,⁽²⁾ the NRC requested that NNECO provide additional information and certification related to the use of the proposed changes to Specification 3.04, and asked for a schedule as to when this information would be submitted. NNECO responded by letter dated November 26, 1990,⁽³⁾ and provided a schedule for our submittal on or before January 15, 1991. The purpose of this letter is to provide the information requested by the NRC Staff.

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- (1) E. J. Mroczka letter to the U.S. Nuclear Regulatory Commission, "Proposed Revision to Technical Specification Changes Suggested by Generic Letter 87-09," dated August 9, 1990.
 - (2) G. S. Vissing letter to E. J. Mroczka, "Request for Additional Information on the License Amendment Application under Generic Letter 87-09 for Millstone Unit 2 (TAC No. 77535)," dated November 8, 1990.
 - (3) E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Request for Additional Information Regarding Generic Letter 87-09 (TAC No. 77535)," dated November 26, 1990.

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NNECO has reviewed all Technical Specifications to which the proposed changes to Specification 3.0.4 would apply. The Technical Specifications that currently specify Specification 3.0.4 as not applicable were determined to be unaffected by the proposed changes to Specification 3.0.4 and are not considered in this certification. The results of our review are discussed in more detail below.

The current Specification 3.0.4 prohibits changing modes unless all of the Limiting Conditions for Operation (LCO) applicable to that higher mode of operation are met. Certain specifications, however, contain an exception to Specification 3.0.4 (for example, see Technical Specification 3.3.3.1, Radiation Monitoring) that allows start-up with equipment or parameters that are not in compliance with the LCO. This exception is appropriate in that some equipment covered by the Technical Specifications is not necessary to adequately mitigate the design basis accidents. In these cases, not having the equipment operable will obviously have no impact on the design basis, so it should not restrict start-up.

The proposed revision to Specification 3.0.4 would specifically allow entry into an operational mode while subject to ACTION requirements provided that those ACTION requirements allow indefinite continued operation. Thus, the exception to Specification 3.0.4 contained in numerous current Technical Specifications is no longer appropriate. Therefore, proposed changes that delete reference to Specification 3.0.4 are acceptable as they do not change the intent of the existing Technical Specifications.

Several of the current Technical Specifications (3.4.3, 3.4.8, 3.6.1.3, and 3.7.1.2) contain limited exemptions from the current Technical Specification 3.0.4 that must be handled differently. Each of these Technical Specifications has been revised⁽⁴⁾ with specific wording to ensure that the intent does not change. Since the intent remains the same, the proposed changes do not have any impact on the consequences of an accident.

The last impact of the changes to Technical Specification 3.0.4 would be on individual Technical Specifications with ACTION requirements which do not require shutdown but which are not currently exempted from Technical Specification 3.0.4. For example, Technical Specification 3.6.3.1, ACTION (b) permits indefinite continued operation with an inoperable containment isolation valve provided the penetration is isolated by a deactivated valve. However, there is no exemption from Technical Specification 3.0.4 that would allow startup. Since the applicable ACTION requirement allows indefinite continued operation, the proposed revision to Technical Specification 3.0.4 as it relates to Specification 3.6.3.1 is thus a minor intent change. In fact, one of the main reasons for the proposed revisions

(4) See Footnote (1).

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is to allow mode changes when subject to ACTION requirements that do not impact continued operation. In these cases, the ACTION requirements provide an equivalent level of safety without requiring a shutdown and allowing startup in this situation will have no adverse impact on the consequences of any accident.

The results of this evaluation were used to identify those Technical Specifications whose ACTION statements provide an acceptable level of safety during a change in operational mode or a specified condition. NNECO did not apply the Specification 3.0.4 proposed change to those Technical Specifications whose ACTION statements did not provide an acceptable level of safety during a change in operational mode or a specified condition. Therefore, NNECO hereby certifies that for each Technical Specification to which the proposed changes to Specification 3.0.4 will be applied, the ACTION statement for that Technical Specification provides an adequate level of protection for a change in operational mode or specified condition.

NNECO recognizes the potential aggregate effect of allowing a mode change while subject to multiple LCO ACTION statements. While the compensatory measures required to cope with any individual equipment not being fully operational may be acceptable, the challenge to operators with many required compensatory actions may not be acceptable. One element of NNECO management control has always included careful consideration of overall plant condition prior to authorizing a change in operational mode or a specified condition. NNECO management will continue to carefully consider the equipment not available, both on an individual basis, as well as in aggregate and will authorize a change in operational mode or a specified condition only when it is prudent to do so. This will limit the reliance on Specification 3.0.4 for plant startups to those situations that are both prudent and safe for plant operation.

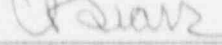
In addition, the plant staff will be made aware of and will be instructed in exercising the proper controls for limiting the use of such exceptions.

We trust the Staff finds this additional information satisfactory. Please contact us if you have any additional questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mrocza
Senior Vice President

BY: 
C. F. Sears
Vice President

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