

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
THE MASSACHUSETTS ELECTRIC COMPANY  
HOLDS WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Seider Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

January 11, 1991

Docket No. 50-245

B13363

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1  
Proposed Revision to Technical Specifications  
Surveillance Requirements for Emergency Core Cooling  
System Instrumentation and Containment Isolation Signals

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, No. DPR-21, by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 1.

Specifically, the proposed changes add surveillance requirements to Table 4.2.1 for containment isolation and Emergency Core Cooling System (ECCS) protective instrumentation for which formal requirements are not currently specified. In addition, Table 4.2.1 is being updated to reflect the applicability of Note 1 to the instrument functional test frequency for reactor high pressure.

### Discussion

Containment isolation valves are installed in lines that penetrate the primary containment and must be isolated during a loss-of-coolant accident so that the radiation dose limits are not exceeded during an accident condition. Actuation of these valves is initiated by containment isolation protective instrumentation shown in Table 3.2.1. ECCS protective instrumentation is provided which initiates action to mitigate the consequences of an accident which is beyond the operator's ability to control. This instrumentation is shown in Table 3.2.2. The containment isolation and ECCS protective instrumentation are subject to the operability requirements of Tables 3.2.1 and 3.2.2, respectively. However, formal surveillance requirements are not currently specified for the following:

9101170148 910111  
PDR ADOCK 05000245  
P PDR

OS3422 REV 4-88

160017

*Academy*  
*[Signature]*

ECCS Instrumentation

- o Isolation Condenser Timer
- o Automatic Blowdown Timer

Containment Isolations

- o Reactor Low Water Level
- o Reactor Low-Low Water Level
- o Drywell High Pressure

The proposed changes add formal surveillance requirements to Table 4.2.1 for the instrumentation shown above, thereby providing assurance that required surveillances will continue to be performed at the specified intervals. This instrumentation is currently subject to instrument functional tests and calibrations as part of existing routine surveillance procedures. The proposed frequencies are consistent with present testing, plant conditions required for testing, and Technical Specification requirements for frequencies applicable to instrumentation performing similar safety functions.

NNECO also proposes to update the instrument functional test frequency specified for reactor high pressure on Table 4.2.1 to reflect applicability of Note 1 to the table, which had previously been omitted. The note is associated with decreasing the required test frequency after exceeding a specified number of exposure hours.

Significant Hazards Consideration

NNECO has reviewed the proposed changes in accordance with 10CFR50.92 and has concluded that they do not involve a significant hazards consideration in that these changes do not:

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

These changes involve adding formal instrumentation- and control-related surveillance requirements to Table 4.2.1 of the Millstone Unit No. 1 Technical Specifications for certain instruments listed on Tables 3.2.1 and 3.2.2. This instrumentation is currently subject to instrument functional and calibration test requirements consistent with both the proposed frequencies and requirements for other instrumentation performing similar safety functions. In addition, Note 1 is being added on Table 4.2.1 for reactor high pressure. Application of this note to reactor high pressure is consistent with its application to instrumentation performing similar safety functions.

Thus, these changes, which will formally place surveillance requirements that already exist in plant procedures into the Technical Specifications

and add a note concerning test frequency based on exposure hours, will not increase the probability or consequences of any transient or accident.

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

Modifying Technical Specifications to add formal surveillance requirements already in place with plant procedures and adding a note concerning test frequency based on exposure hours will not modify plant response to any operational or transient event. Neither will they create a new nor cause a different kind of accident from any previously analyzed.

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

Instrumentation and controls required to initiate and control primary containment isolations and core cooling systems are listed on Table 3.2.1 and Table 3.2.2, respectively, in the Millstone Unit No. 1 Technical Specifications. However, some instruments were not included on the calibration frequency Table 4.2.1. The formal surveillance requirements being added in this change are consistent with what is currently performed for similar instrumentation with requirements already in Technical Specifications, and the added requirements are consistent with what is currently done for this instrumentation via plant procedures. Application of the note concerning test frequency based on exposure hours is consistent with its application to instruments performing similar safety functions. Therefore, there is no impact on the margin of safety.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by giving certain examples (March 6, 1986, 51FR7751) of amendments that are considered not likely to involve significant hazards considerations. The changes proposed herein most closely resembles Example (ii), a change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications. In the current Technical Specifications there is no specification for the surveillance requirements for certain ECCS instrumentation and containment isolation signals which are subject to operability requirements. The proposed changes formalize existing plant procedure surveillance requirements for isolation condenser timer and automatic blowdown timer instrumentation and reactor low water level, reactor low-low water level, and drywell high pressure isolation signals by placing the requirements into the Technical Specifications. In addition, Note 1 is being added to Table 4.2.1 for reactor high pressure.

The Millstone Unit No. 1 Nuclear Review Board has reviewed and approved the changes proposed herein and has concurred with the above determinations.

This change is not required to support continued plant operation and can be implemented within 60 days upon issuance. No specific schedule for issuance is requested.

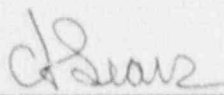
U.S. Nuclear Regulatory Commission  
B13363/Page 4  
January 11, 1991

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka  
Senior Vice President


BY:   
C. F. Sears  
Vice President

cc: Mr. Kevin McCarthy, Director  
Radiation Control Unit  
Department of Environmental Protection  
Hartford, CT 06116

T. T. Martin, Region I Administrator  
M. L. Boyle, NRC Project Manager, Millstone Unit No. 1  
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

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

Then personally appeared before me, C. F. Sears, 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 Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

  
Notary Public