

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
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March 18, 1983

Docket No. 50-245
A02991

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
Response to Generic Letter No. 83-02
NUREG-0737 Technical Specifications

In Reference (1), the NRC Staff provided Northeast Nuclear Energy Company (NNECO) with Generic Letter No. 83-02, in which licensees of all boiling water power reactors were requested to respond to discussion and guidance on NUREG-0737 items which require Technical Specifications.

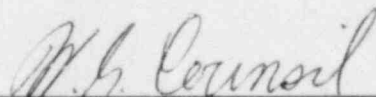
Therefore, in response to Reference (1), NNECO on behalf of Millstone Unit No. 1, hereby provides the requested information in Attachment 1 to this letter.

In addressing the Reference (1) request, Northeast Nuclear Energy Company reviewed the concerns of each item against the current Technical Specifications for Millstone Unit No. 1. For those cases where Technical Specifications already existed, information is supplied as to how the current Technical Specifications satisfy the concerns of NUREG-0737. In all other cases, NNECO determined that no new Technical Specifications would be proposed at this time for the reasons documented in Attachment 1. In summary, there is no instance where we are preparing additional changes pursuant to 10CFR 50.90.

We trust you will find this information responsive to your Reference (1) request.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President

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Attachment

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Docket No. 50-245

Attachment 1

Millstone Nuclear Power Station, Unit No. 1

Response to Generic Letter No. 83-02

NUREG-0737 Technical Specifications

March, 1983

REFERENCES

- (1) D. G. Eisenhut letter to All Boiling Water Reactor Licensees, dated January 10, 1983.
- (2) J. J. Shea letter to W. G. Council, dated February 22, 1982
- (3) D. M. Crutchfield letter to W. G. Council, dated February 8, 1982.
- (4) W. G. Council letter to D. G. Eisenhut, dated October 1, 1982.
- (5) W. G. Council letter to W. J. Dircks, dated August 6, 1982.
- (6) W. G. Council letter to W. J. Dircks, dated November 5, 1982.
- (7) W. G. Council letter to D. G. Eisenhut, dated December 31, 1980.
- (8) W. G. Council letter to R. A. Clark, dated February 21, 1981.
- (9) D. M. Crutchfield letter to W. G. Council, dated July 20, 1981.
- (10) W. G. Council letter to D. M. Crutchfield, dated March 1, 1983.
- (11) W. G. Council letter to D. M. Crutchfield, dated March 2, 1983.
- (12) W. G. Council letter to R. M. Clark/D. M. Crutchfield, dated November 22, 1982.
- (13) W. G. Council letter to D. G. Eisenhut, dated December 31, 1980.
- (14) W. G. Council letter to the Secretary of the Commission, dated May 28, 1982.
- (15) D. M. Crutchfield letter to W. G. Council, dated March 8, 1982.
- (16) D. M. Crutchfield letter to W. G. Council, dated December 11, 1981.

(1) STA Training (1.A.1.1.3)

Millstone Unit 1 Technical Specification 6.2.2.a presently requires a Shift Technical Advisor to be on duty during operational modes 1 thru 3. It is NNECO's position that this specification is sufficient and no additional Technical Specifications are being proposed, since normal operator training and requalification programs are not presently in the Technical Specifications. In accordance with the Staff's SER issued by Reference (2), NNECO considers Item 1.A.1.1.3 to be resolved for Millstone Unit No. 1.

(2) Limit Overtime (1.A.1.3)

In Reference (3), the Staff concluded that Administrative Control Procedure ACP-1.12, "Scheduling of Station Personnel Working Hours" was acceptable and met the guidance of I&E Circular 80-02, although in Reference (3) the Staff incorrectly referenced the Haddam Neck administrative procedure. Subsequently, ACP-1.12 was revised as a result of Generic Letters 82-02 and 82-12. In Reference (4), NNECO informed the Staff that ACP-1.12 had been revised to conform to the guidance of Generic Letters 82-02 and 82-12 with the exception that infrequent or short-term deviations from this procedure would not require approval of the plant superintendent or his deputy. NNECO has concluded that these controls are adequate to meet the intent of Generic Letter 82-12 and NUREG-0737 Item 1.A.1.3.

It is NNECO's position that technical specifications are not necessary to ensure that the policy statement guidelines of Generic Letter No. 82-12 are followed. Additional Technical Specifications would not conform to the intent of the Commission's proposed rule published in the Federal Register (47FR13369) regarding proposed changes to technical specifications for nuclear power reactors. Therefore, NNECO has determined that changes to the Technical Specifications are not required.

(3) Dedicated Hydrogen Penetrations (II.E.4.1)

References (5) and (6) stated that the primary means of combustible gas control following a design basis LOCA at Millstone Unit 1 is a nitrogen inerted containment. References (5) and (6) also justified that containment purging, post accident nitrogen addition, and hydrogen recombiners are not necessary for combustible gas control and therefore dedicated penetrations for external recombiners or purge/repressurization systems are not necessary. Additionally, the newly installed containment isolation valves for the Drywell Compressor (and back-up nitrogen bottles) meet the Appendix J criteria of 10CFR50.

(4) Containment Pressure Setpoint (II.E.4.2.5)

In References (7) and (8), NNECO provided information and justification for the minimum containment pressure setpoint used to initiate containment isolation for Millstone Unit 1. In Reference (9), the Staff transmitted to NNECO an SER which concluded that the containment isolation pressure setpoint for Millstone Unit 1 meets the requirements of both NUREG-0737 and additional Staff guidelines. Therefore, no technical specification changes are required.

(5) Containment Purge Valves (II.E.4.2.6)

In References (10) and (11), NNECO addressed the issues of containment purging and containment purge and vent valve operability, both of which in part discuss NUREG-0737 Item II.E.4.2.6. Millstone Unit 1 uses purge/vent valves (greater than three inches) typically only prior to a shutdown and after a startup. Whenever these valves are used, releases are vented through the Standby Gas Treatment System (SGTS) and a dedicated operator in the control room monitors containment pressure and temperature throughout the process. These limitations are imposed by Operating Procedure 311. OP 311 additionally requires that the drywell and torus exhaust valves be closed in the event of a reactor scram.

Environmental Technical Specification (ETS) 2.4.2.2.I requires that the drywell be purged through the SGTS at all times that primary containment integrity is required. Although NNECO has recently proposed deletion of the ETS (Reference (12)), this purging requirement was included in the Safety Technical Specifications as part of the proposal. Thus, we believe that existing operational controls and technical specification requirements obviate the need for additional technical specification limitations.

With respect to purge/vent containment isolation valves with resilient seats, we currently test these valves once per operating cycle and repair the seats in accordance with the manufacturer's instructions. To date there has been no degradation more rapid than predicted by the manufacturer. Therefore, we do not believe a technical specification change is needed.

(6) Radiation Signal on Purge Valves (II.E.4.2.7)

As noted in Reference (1), the Staff is currently reviewing the BWR Owner's Group evaluation with respect to Item II.E.4.2.7. The need for a technical specification change will thus be decided subsequent to Staff review of the BWR Owner's Group evaluation and our plant-specific submittals.

(7) Reporting SV and RV Failures and Challenges (II.K.3.3)

SV and RV Challenges

As indicated in Reference (13), NNECO informed the NRC Staff that challenges to safety and relief valves would be submitted and have been submitted in the Annual Reports in conjunction with 10 CFR 50.59. It is NNECO's position that no further commitment is necessary and including this item in the technical specifications would not conform to the intent of the Commission's proposed rule published in the Federal Register Volume 47 #61, March 30, 1982, pp. 13369-13376. In Reference (14), Northeast Utilities Service Company on behalf of NNECO emphatically endorsed the concepts embodied in the proposed rule, expressing the view that the volume and complexity of the technical specifications has escalated to a level not conducive to focusing the attention of plant operators on matters of authentic safety significance. This view is still valid and applies here.

SV and RV Failures

NNECO presently has procedural and technical specification provisions for prompt reporting of relief valve and safety valve failures to the NRC. In Reference (15), the Staff issued an SER which concluded that these provisions are adequate to meet the requirements, of Item II.K.3.3. As such, no further action is planned.

- (8) RCIC Restart and RCIC Suction (II.K.3.13, II.K.3.22)
- (9) Isolation of HPCI and RCIC Modification (III.K.3.15)

Millstone Unit 1 utilizes a Feedwater Coolant Injection (FWCI) System and an Isolation Condenser in lieu of HPCI/RCIC Systems. Therefore, Items II.K.3.13, II.K.3.22, and III.K.3.15 are not applicable to Millstone Unit 1 and no Technical Specification changes are required.

(10) Interlock on Recirculation Pump Loop (II.K.3.14)

This item applies only to nonjet pump plants and is not applicable to Millstone Unit 1. Therefore, no Technical Specification changes are required.

(11) Common Water Level Reference (II.K.3.27)

In Reference (16), the Staff issued Amendment No. 80 to Provisional Operating License No. DPR-21 for Millstone Nuclear Power Station, Unit No. 1. The Amendment consisted of technical specification changes that established new reactor vessel level setpoints that were consistent with the installation of a common water level reference required by Item II.K.3.27 in NUREG-0737. Therefore, no further action is required.

(12) Manual Depressurization (II.K.3.45)

As noted in Reference (1), technical resolution of this Action Plan Item has just been completed, and the Staff will not require any modifications in plant design and operation. Therefore, no changes to Technical Specifications are required.