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January 18, 1984

Docket No. 50-336

A03502

Director of Nuclear Reactor Regulation Attn: Mr. James R. Miller, Chief Operating Reactors Branch #3 U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Reference: (1

- (1) W. G. Counsil letter to R. A. Clark, dated July 15, 1921.
- (2) D. G. Eisenhut letter to All Power Reactor Licensees (Except SEP Licensees), dated November 20, 1980.
- (3) J. R. Miller letter to W. G. Counsil, dated September 6, 1983.
- (4) W. G. Counsil letter to R. Reid, dated January 8, 1979.

Gentlemen:

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Millstone Nuclear Power Station, Unit No. 2 Proposed Revisions to Technical Specifications Snubber Surveillance

Reference (1) provided the NRC Staff a request to amend the Operating License for Millstone Unit No. 2 regarding inservice inspections of hydraulic and mechanical snubbers. Representatives from the Office of Inspection and Enforcement, Region I and Northeast Nuclear Energy Company (NNECO) met on June 23, 1983 to discuss differences between the Reference (1) proposal and the NRC model technical specifications for snubbers provided in Reference (2). The deviations discussed at the June 23, 1983 meeting were provided to NNECO in Reference (3).

As a result of that meeting, NNECO has revised the Reference (1) license amendment request in accordance with the discussions held on June 23, 1983. Remaining differences between the attached proposed technical specifications and the NRC model technical specifications are discussed in the attachment.

Pursuant to 10CFR50.90, NNECO hereby proposes to amend its operating license, No. DPR-65, by incorporating the changes identified in the attachment into the Millstone Unit No. 2 Technical Specifications.

The attached proposed changes have been reviewed pursuant to 10CFR 50.59 and have not been found to constitute an unreviewed safety question. The basis for this conclusion is that increased snubber surveillance and testing will not increase the probability or consequences of an accident, a new type of accident or malfunction of a different type than previously evaluated in the safety analysis report is not created and the margins of safety as defined in the bases of the technical specifications will not be decreased.

The proposed changes have been reviewed pursuant to 10CFR 50.92 and have been found to not involve a significant hazards consideration. The basis for this determination is contained in item ii of 48 FR 14870 which provided examples of amendments not likely to involve a significant hazards consideration. Specifically, the attached proposed license amendment provides additional limitations, restrictions and control not presently included in the license.

Pursuant to 10CFR50.91(b) a copy of this document is being provided to the State of Connecticut. NNECO has reviewed the above proposed license amendment pursuant to the requirements of 10CFR170, and has determined that the proposal constitutes a Class 3 amendment. The basis for this determination is that the proposal involves a single safety issue which does not involve a significant harards consideration. NNECO has previously remitted \$4000 (four thousand dollars) with Reference (4) for a similar, pending license amendment application. The changes proposed in Reference (4) have been incorporated herein and are of the same subject matter.

With the docketing of this proposed license amendment, NNECO hereby withdraws the amendments proposed in References (1) and (4).

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

M. L. Counsil

Senior Vice President

cc: Mr. Arthur Heubner Director, Radiation Control Unit Department of Environmental Protection State Office Building Hartford, Connecticut 06116

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

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Larraine J. Almico Notary Public

My Commission Expires March 31, 1988