

August 31, 1995

Docket No. 50-336
B15213

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
Administrative Controls - Section 6

Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Facility Operating License No. DPR-65 by incorporating the changes to the Millstone Unit No. 2 Technical Specifications identified herein. This license amendment request is submitted pursuant to the requirements of 10CFR50.90.

Discussion/Background

On June 24, 1994, ⁽¹⁾ NNECO submitted a license amendment request to permit an individual who does not possess a current Senior Reactor Operator (SRO) license to serve as the Millstone Unit No. 2 Operations Manager. The license amendment was issued by the Staff on August 11, 1994. ⁽²⁾ The new Section 6.3.1.a states in part:

. . . then the Operations Manager shall have held a senior reactor operator license at a Pressurized Water Reactor other than Millstone Unit No. 2

During preparation of similar changes for Millstone Unit Nos. 1 and 3, it was identified that a literal reading of this specification

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- (1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Proposed Revision to Technical Specifications -- Administrative Controls - Section 6," dated June 24, 1994.
 - (2) G. S. Vissing letter to J. F. Opeka, Issuance of Amendment (TAC M89735)," dated August 11, 1994.

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excluded individuals who had held a Millstone Unit No. 2 SRO in the past, but who are no longer licensed. This was never the intent of this specification.

Description of Proposed Change

The phrase "other than Millstone Unit No. 2" will be removed from Section 6.3.1 on page 6-2.

Attachment 1 provides a markup with the proposed change. Attachment 2 provides a proposed retyped page of the Millstone Unit No. 2 Technical Specifications.

Safety Assessment

NNECO requested and received a change to this technical specification section which allowed the flexibility for the Operations Manager not to maintain an SRO license. The basis for acceptability of that change was that requiring the Assistant Operations Manager to have a current SRO license, combined with the experience gained by the Operations Manager while licensed, ensured sufficient technical and systems knowledge existed in the senior operations management position.

Eliminating the statement which could be interpreted to exclude individuals who had been previously licensed on Millstone Unit No. 2 does not diminish the basis for that change. An individual who previously maintained an SRO license on Millstone Unit No. 2 will have the level of expertise expected of any individual who has held an SRO license, and will further have plant specific knowledge. Therefore, the proposed change is safe.

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.92 and concluded that the change does 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 change does not involve an SHC because the change would not:

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

The proposed change does not affect any system or equipment of Millstone Unit No. 2. The proposed change does not affect the qualification of any of the licensed individuals involved in the day-to-day operation of Millstone Unit No. 2. The

proposed change corrects a statement which could be interpreted such that an individual who once held a Millstone Unit No. 2 SRO license would not be eligible to be Operations Manager. Since this change does not affect any equipment or operating procedures, does not affect the level of expertise and training required for on-shift personnel, and does not reduce the level of expertise required of operations management, this change 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.

This change does not affect any equipment or operating procedures, does not affect the level of expertise and training required for on-shift personnel, and does not reduce the level of expertise required of operations management. Therefore, this change does not create the possibility of a new or different kind of accident.

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

This change eliminates a phrase which could be interpreted to prevent an individual who had possessed a Millstone Unit No. 2 SRO license from becoming the Operations Manager. The training and experience necessary to possess a Millstone Unit No. 2 SRO license is equivalent to that of other PWRs. Therefore, this proposed change does not involve a significant reduction in the margin of safety.

The Commission has provided guidance concerning the application of the standards of 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are not considered likely to involve an SHC. The change proposed herein is not enveloped by any of the examples, however, this does not diminish the conclusion that the proposed change does not constitute an SHC.

Environmental Considerations

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not increase the types and amount 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 change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

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In accordance with 10CFR50.91(b), the State of Connecticut is being provided with a copy of this license amendment request.

Schedule

NNECO does not have a specific schedular requirement for the issuance of this change. As such, this change can be processed at the Staff's convenience. NNECO requests that the change be effective upon issuance with implementation within 60 days.

Conclusion

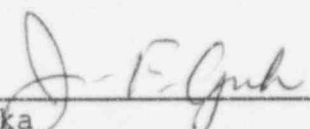
As discussed above, the proposed change has been determined not to involve a significant hazards consideration pursuant to 10CFR50.92. Additionally, NNECO has determined that this license amendment request meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an environmental impact statement.

The Nuclear Safety Assessment Board has reviewed the proposed change and concurs with the above determinations.

If you have any questions, please contact Mr. G. P. van Noordennen at (203) 440-2084.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

Attachments (2)

cc: See Page 5

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cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3

Mr. Kevin T.A. McCarthy, Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Subscribed and sworn to before me

this 31st day of August, 1995

Dennis J. Dorman

Date Commission Expires: 8/31/98

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2
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Marked-up Page

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