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

February 7, 1992

Docket No. 50-336 B14033

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2 Proposed Change to Technical Specification Containment Leakage

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, No. DPR-65, by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 2.

## Discussion

The existing Technical Specification 4.6.1.2.a, "Containment Leakage Surveillance Requirements," states that three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at 40  $\pm$  10-month intervals during shutdown at Pa (54 psig) during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection.

The proposed technical specification change will extend the surveillance requirements of Technical Specification 4.6.1.2.a to allow the second Type A tot, within the second 10-year service period, to be conducted during the Cycle 11 refueling outage scheduled to commence in May 1992. This technical specification change is a one-time extension for Cycle 11 only. The 50-month time limit (April 8, 1992) would be exceeded due to the number of in-cycle shutdowns which have extended the time period between refueling outages. Extension of the surveillance requirement will have minimal impact on plant and public safety because the previous integrated leak rate test (ILRT) result was well below the allowable limit. The proposed technical specification change also includes the addition of Surveillance Requirement 4.6.1.2.h, which states the provisions of Technical Specification 4.0.2 are not applicable, which allows the Millstone Unit No. 2 Technical Specifications to be consistent with Millstone Unit Nos. 1 and 3 and Combustion Engineering Standard Technical Specifications.

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U.S. Nuclear Regulatory Commission B14033/Page 2 February 7, 1992

On February 8, 1988, Millstone Unit No. 2 successfully conducted a Type A test, which was the first Type A test in the second 10-year service period, and passed both the "as-found" an "as-left" ILRTs. Since then, there have not been any modifications made to the plant which could adversely affect the test results. Type B and C tests have also been completed during the 1989 and 1990 refueling outages and are scheduled to be performed during the upcoming 1992 refueling outage. Demonstrated operability of the components and penetrations. with the local leak rate test program, provides additional assurance that containment integrity has been maintained.

## Significant Hazards Consideration

The proposed technical specification change has been reviewed against the criteria of 10CFR50.92, and it has been determined not to involve a significant hazards consideration. Specifically, the proposed change does not:

- Involve a significant increase in the probability or consequences of an accident previously analyzed. The leakage condition of the containment extrapolated from the ILRT of February 8, 1988, was 36.8 percent of the conservative limit of 0.75 La. No operations are known to have occurred which would suggest a significant degradation of this estimate. There are no design basis accidents adversely affected due to this change.
- 2. Create the possibility of a new or different kind of accident from any previously analyzed. Containment isolation features limit the consequences of an accident. The proposed extension to the test schedule will have no impact on this. Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created. The change meets the requirements of IOCFR50, Appendix J, Subsection III.D.1.(a) since the surveillance interval extension will allow three Type A tests to be completed at approximately equal intervals within the IO-year period.
- 3. Involve a reduction in the margin of safety. The change does not impact or reduce the margin of safety of the containment or other protective boundaries, nor does it challenge the safety limits or their boundaries. Also, since the change does not affect the consequences of any accident previously analyzed, there is no reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain exam les (51.R7751, March 6, 1986) of amendments that are considered not likely to involv a significant hazards consideration. Although the change proposed herein is not enveloped by a specific example, the proposed change is a one-time change and is applicable to Cycle 11 only and will not create a new or different type of accident than any previously evaluated.

The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved the attached proposed revision and has concurred with the above determinations.

U.S. Nuclear Regulatory Commission 814033/Page 3 February 7, 1992

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Based on the information contained in this submittal and the environmental assessment for Millstone Unit No. 2, there are no significant radiological or nonradiological impacts associated with the proposed action, and the proposed license amendment will not have a significant effect on the quality of the human environment.

Regarding our schedule for this amendment, NNECO respectfully requests issuance prior to April 8, 1992, with the amendment effective upon date of issuance.

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

J. F. Opeka

Executive Vice President

cc: T. T. Martin, Region I Administrator

G. S. Vissing, NRC Project Manager, Millstone Unit No. 2

W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

STATE OF CONNECTICUT) ) ss. Berlin

JOUNTY OF HARTFORD

Then personally appeared before me, J. F. Opeka, who being duly sworn, did state that he is Executive 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.

Kirraine Alamico

Lav Commission Expires March 31, 1993