

Northeast
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

October 20, 1995

Docket No. 50-336
E15338

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 2
Additional Information
Proposed Revision to Technical Specifications
Electrical Power Systems - Shutdown

By letter dated May 26, 1995,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) submitted an amendment request to the NRC Staff which proposed changes to the Technical Specifications (TS) of Millstone Unit No. 2. The proposed changes would modify TS 3.8.1.1., "Electrical Power Systems, A.C. Sources, Operating," TS 3.8.1.2, "Electrical Power Systems, Shutdown," and TS 3.8.2.2, "Electrical Power Systems, A.C. Distribution - Shutdown," to provide operational flexibility as well as consistency between action statements and to eliminate certain surveillance requirements that are not applicable in Modes 5 or 6. NNECO also requested that the NRC Staff process the license amendment request on an exigent basis pursuant to 10CFR50.91(a)(6).

In subsequent discussions with the Staff, NNECO verbally withdrew the request to process these changes on an exigent basis. Furthermore, during the Staff's review of the proposed changes, the Staff requested additional changes to the proposed Action requirements to make them more consistent with NUREG-1432 Standard Technical Specifications (STS).

The purpose of this letter is to formally withdraw the need for exigent handling of this request, and to provide revised TS pages which address the Staff's comments regarding TS 3.8.1.2 and TS 3.8.2.2. Also included with this letter is an additional proposed change to modify TS 3.8.2.4, "Electrical Power Systems, D.C. Distribution - Shutdown." This additional change is closely

(1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2 - Proposed Revision to Technical Specifications, Emergency Power Systems - Shutdown," dated May 26, 1995.

ADD 1/1

related to the previously submitted amendment request and should be considered concurrently with the previously requested changes. NNECO has determined that this additional change does not involve any significant safety impact or a significant hazards consideration (SHC). Thus, the operational risk associated with the additional request has no significant impact on public health and safety.

Background

At the time of the initial amendment request, Millstone Unit No. 2 was in an extended refueling outage, and was experiencing difficulties with its emergency diesel generator load sequencers. Since these problems were resolved within a few days following the submittal, the need for exigent handling was eliminated.

During the initial evaluation of the proposed changes, the Staff determined that, while the proposal would correct problems with the TS as currently stated, certain modifications would enhance the proposed revision. While reviewing the Staff's comments, NNECO further determined that an additional related action statement, for TS 3.8.2.4, should also be modified to provide uniformity within the TS and yield consistency with the STS.

With respect to the modified proposals for TS 3.8.1.2 and TS 3.8.2.2, the Safety Assessment (SA) and SHC provided in the May 26, 1995, submittal remain valid and applicable. Similarly, the original Environmental Considerations are applicable, and the Nuclear Safety Assessment Board review conclusions remain unchanged.

Description of Proposed Changes

The additional proposed change would modify the action statement for TS 3.8.2.4, "Electrical Power Systems, D.C. Distribution - Shutdown." This proposed amendment would provide an action statement that is consistent with the previously proposed change to TS 3.8.2.2, and with other action statements contained in TS Section 3/4.8, "Electrical Power Systems," for Modes 5 and 6. Furthermore, the proposal to modify TS 3.8.2.4 yields an action statement that conforms with the STS.

Safety Assessment

The proposed change to TS 3.8.2.4 is safe because it better identifies the appropriate actions for Modes 5 and 6. The action statement is being revised to be consistent with other parts of TS Section 3/4.8 which require that core alterations and fuel movement be halted until the situation is corrected. With the plant in

Modes 5 or 6 and fuel in the reactor core, and no core alterations or fuel movement being made, it is unnecessary to maintain containment integrity.

Technical Specification 3/4.6.1, "Primary Containment" requires that primary containment be maintained in Modes 1 through 4. If primary containment is lost, then the plant must be brought to Mode 5. This corroborates that Mode 5 or Mode 6, with no core alteration and no fuel movement, is a safe plant configuration.

Containment integrity in Modes 5 or 6 is in fact a personnel safety issue during a refueling. With the containment sealed during a refueling, air usage for valve operation and air leakage into containment from the control air system typically raises internal pressure in the containment approximately 1 psia. During personnel entry and egress, this elevated pressure in containment causes pain and discomfort to plant workers during the pressurization and depressurization in the airlock personnel access tunnel.

Significant Hazards Considerations

In accordance with 10CFR50.92, NNECO has reviewed the proposed changes and has concluded that they do not involve an SHC. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the change would not:

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

The change to TS 3.8.2.4 merely renders the action statement consistent with, and appropriate for, operational Modes 5 and 6.

Since D.C. power is not credited in the mitigation of Mode 5 and 6 events and accidents, such as fuel handling accidents, there is no increase in the probability or consequences of previously evaluated accidents.

The action statement in TS 3.8.2.4 has been revised to cite actions that are more appropriate for Modes 5 and 6 for Millstone Unit No. 2. This is due to the ability to maintain the plant in a safe condition without D.C. power distribution available in Modes 5 and 6. In addition, the proposed change is consistent with the CE Owner's Group Standard Technical Specifications (NUREG-1432) and with other Millstone Unit No. 2 action statements. Consequently, there is no increase in the probability or consequences of previously evaluated accidents.

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

The proposed change does not alter or affect the design, function, failure mode, or operation of the plant. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed change to the TS provides greater consistency among action statements during Modes 5 and 6. Since the D.C. distribution system is not credited in the mitigation of Mode 5 and 6 events and accidents, and since it is part of our shutdown risk management program to assure that adequate fuel cooling is able to be provided, the proposed change to the TS does not reduce 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. While the additional proposed change is not enveloped by a specific example, it has been shown that the proposed change to the TS is safe and is not an SHC.

Environmental Considerations

NNECO has reviewed the proposed additional license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not increase the types and amounts of effluents that may be released offsite, nor does it 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.

Nuclear Safety Assessment Board Review

The Nuclear Safety Assessment Board has reviewed and concurs with the above determination.

State Notification

In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this additional proposed amendment to ensure their awareness of this request.

U.S. Nuclear Regulatory Commission
B15338/Page 5
October 20, 1995

Conclusion

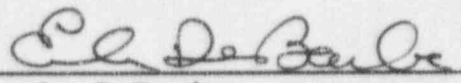
In summary, NNECO is submitting recommended changes to previously requested modifications to TS 3.8.1.2 and TS 3.8.2.2. The previously submitted SA, SHC, and Environmental Considerations remain applicable to these recommended changes. Additionally, NNECO is requesting consideration of a related change that would modify TS 3.8.2.4. We emphasize our conclusion that this proposed amendment, including the additional change proposed herein, does not involve any undue safety risk or the need for an environmental impact statement.

As always, we are prepared to provide any additional information that the NRC Staff may need to respond to this request. The NNECO contact for this proposed revision is Mr. Rod S. Peterson at (203) 440-2074.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
Vice President

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
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

U.S. Nuclear Regulatory Commission
B15338/Page 6
October 20, 1995

Subscribed and sworn to before me

this 20th day of October, 1995

Henry E. Sherman

Date Commission Expires: 8/31/98