

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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August 22, 1984

Docket No. 50-336

A04114

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

- References: (1) J. R. Miller letter to W. G. Council, dated June 13, 1984.  
(2) W. G. Council letter to D. G. Eisenhut, dated July 25, 1984.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
Auxiliary Feedwater Automatic Initiation  
Technical Specification Surveillance

In Reference (1), the NRC Staff requested Northeast Nuclear Energy Company (NNECO) to revise the Millstone Unit No. 2 Technical Specifications to specifically delineate surveillance requirements for the automatic actuation logic of the Auxiliary Feedwater initiation function.

We maintain our position that additional verbiage in the Technical Specifications is not necessary to ensure the proper surveillances are performed on the Auxiliary Feedwater automatic actuation logic. The procedure cited in Reference (1) was developed to satisfy the present surveillance requirement which requires a channel functional test of the steam generator level-low trip function for automatic auxiliary feedwater initiation. NNECO considers the auxiliary feedwater trip function to include the automatic actuation logic circuits. This is not the case with the other Engineered Safety Features (ESF) listed in Table 3.3-2 and 4.3-2. As such, these trip functions specifically call out surveillance requirements for both the trip and actuation logic circuits. The auxiliary feedwater automatic initiation function was added to the ESF System several years after startup and the design is independent from that of the original ESF functions. The current surveillance requirements as delineated in Table 4.3-2 for the Auxiliary Feedwater Functional Unit apply, in our view, to both the trip and actuation logic circuits. Our existing procedures reflect this interpretation.

Exercises such as this where license amendments must be initiated, reviewed and approved expend both licensee and Staff resources with essentially no attendant safety improvement. Internal reviews of technical specification change requests including 10CFR50.59 and 10CFR50.92 reviews are necessary, prenotice requirements and NRC review and safety evaluation reports must also be

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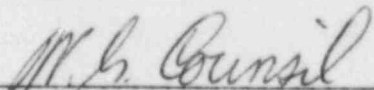
generated. Current surveillance practices will not be altered, as acknowledged by the Staff in Reference (1), if the requested license amendment is processed and issued. The ability to effectively inspect and ensure appropriate surveillance practices for the Auxiliary Feedwater System currently exist within the Technical Specification and will not be enhanced by the requested changes to the license.

Notwithstanding the above arguments, NNECO intends to submit the modified technical specification surveillance requirement along with those changes identified in Reference (2) stemming from our review of Generic Letter 83-37. These changes are scheduled to be docketed by October 31, 1984. In the future, we suggest that NRC deliberations on the need for additional specifications consider the above perspectives.

Should the Staff, as a result of this information, determine that additional technical specifications for auxiliary feedwater initiation surveillance are not appropriate, we request that you inform us promptly in order that our efforts in this regard can be terminated.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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W. G. Council  
Senior Vice President

cc: V. Stello, Jr.