



January 5, 1995

Docket No. 50-336
B15476

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
Reactor Protective and Engineered Safety Feature
Actuation System Instrumentation

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, DPR-65, for Millstone Unit No. 2 by incorporating the attached Technical Specifications revision to Sections 3.3.1.1, 3.3.2.1, and 3.7.1.6 and Tables 3.3-2, 3.3-3, 3.3-4, and 3.3-5 and their Bases.

The proposed technical specification changes have been developed to address two separate issues. The first proposed change incorporates the recommendations contained in Generic Letter 93-08.⁽¹⁾ The second proposed change removes certain cycle specific notes which have expired. Generic Letter 93-08 provides guidance for requesting a license amendment to relocate tables with instrument response time limits from the technical specifications to a controlled document. The removal of the cycle specific notes is an editorial change.

Attachment 1 to this letter provides a safety assessment for the proposed changes. Attachment 2 is the determination of no significant hazards considerations. Attachment 3 is a copy of the marked-up version of the appropriate pages of the current technical specifications. Attachment 4 contains the retyped technical specification pages.

NNECO has reviewed the proposed technical specification changes in accordance with 10CFR50.92 and concludes that the changes do not involve a significant hazards consideration. NNECO has also

(1) L. J. Callan letter to All Holders of Operating Licenses for Nuclear Power Reactors, "Relocation of Technical Specification Tables of Instrument Response Time Limits (Generic Letter 93-08)," dated December 29, 1993.

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reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations and concludes that the changes do not increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Thus, NNECO concludes that the proposal satisfies 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

The Nuclear Safety Assessment Board concurs with the above determinations. In accordance with 10CFR50.91(b), NNECO is providing the State of Connecticut with a copy of this proposed license amendment.

Regarding the proposed schedule for this amendment, we request issuance at your earliest convenience and implementation within 60 days of issuance to ensure adequate time to revise appropriate procedures and controlled documents.

The following is NNECO's commitment made within this letter. Other statements within this letter are provided as information only.

B15476: If the proposed license amendment is approved by the NRC Staff, NNECO will relocate the reactor protective instrumentation response time table and the engineered safety features response time table to the Millstone Unit No. 2 Technical Requirements Manual.

If there are any questions regarding this submittal, please contact Mr. Mario Robles at (860) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. A. DeBarba
Vice President

cc: See Page 3

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c: 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 McCarthy
Bureau of Air Management
Monitoring & Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Subscribed and sworn to before me

this 5th day of January, 1996

Laura M. Perzanowski

Date Commission Expires: 12/31/97

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications
Reactor Protective and Engineered Safety Feature
Actuation System Instrumentation

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Attachment 1
Millstone Nuclear Power Station - Unit No. 2
Proposed Revision to Technical Specifications
Reactor Protective and Engineered Safety Feature
Actuation System Instrumentation

Description of Proposed Changes

NNECO is proposing to implement the guidance of Generic Letter 93-08 and relocate Tables 3.3-2, "Reactor Protective Instrumentation Response Times" and 3.3-5, "Engineered Safety Features Response Times" from the technical specifications to the Millstone Unit No. 2 Technical Requirements Manual (TRM). The Millstone Unit No. 2 TRM is a controlled document which requires that any addition or deletion be supported by a 10CFR50.59 evaluation. The requirement to periodically measure these response times will remain in the technical specifications. In accordance with Generic Letter 93-08, the Limiting Conditions for Operations for Technical Specifications 3.3.1.1, 3.3.2.1, and 3.7.1.6 are also proposed to be revised to eliminate their references to the aforementioned tables. NNECO has also proposed to revise Bases 3/4.3.1 and 3/4.3.2 to reference that the instrument response times are located in the TRM and that these tables in the TRM are now controlled under 10CFR50.59.

NNECO also proposes to remove a cycle-specific note from Tables 3.3-3 and 3.3-4.

Safety Assessment

The proposed modification will relocate the tables of response time limits for the reactor protective system and the engineered safety feature actuation system instruments from the technical specifications to the Millstone Unit No. 2 TRM.

The limiting conditions for operation for the reactor protective system and the engineered safety feature actuation system instruments require that these systems be operable with response times as specified in technical specification tables for each of these systems. The surveillance requirements specify that these systems should be tested and that the instruments should be verified to assure that the response time of each function is within its limits. Relocating the tables of the reactor protective system and engineered safety feature actuation system instrument response time limits from the technical specifications to the TRM will not alter these surveillance requirements. The TRM will address the response time limits for the reactor protective system and engineered safety feature actuation system instruments,

including those channels for which the response time limit is indicated as "NA"; that is, a response time limit is not applicable. The TRM will also clarify response time limits where footnotes are included in the tables that describe how those limits are applied.

The TRM is a controlled manual and is an appropriate location for the relocated instrument response times. Any changes to the technical requirements portion of the TRM requires that a 10CFR50.59 evaluation be performed as well as an appropriate review by the Plant Operations Review Committee.

The proposed changes to the technical specifications will also modify Tables 3.3-3 and 3.3-4 by removing a cycle-specific note that is no longer applicable. The note, which applied to Cycle 12 only, stated that operability of the auxiliary feedwater (AFW) automatic initiation logic is reliant on an operator action to ensure successful initiation of AFW. For Cycle 13, a design change was implemented which provides automatic initiation of AFW. Therefore, an administrative change is proposed to remove the note.

The proposed changes do not affect the configuration, operation, or performance of any system, structure, or component. Thus, the changes are safe.

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications
Reactor Protective and Engineered Safety Feature
Actuation System Instrumentation
Determination of No Significant Hazards Consideration

January 1996

Attachment 2
Millstone Nuclear Power Station - Unit No. 2
Proposed Revision to Technical Specifications
Reactor Protective and Engineered Safety Feature
Actuation System Instrumentation
Determination of No Significant Hazards Consideration

Significant Hazards Consideration

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

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

The proposed license amendment will remove the reactor protective system and engineered safety feature actuation response times from the technical specifications. This proposed change will not affect the operation of the reactor protective system and the engineered safety feature actuation system. Operability and surveillance requirements are still maintained in the technical specifications and the response times will be included and maintained in the Technical Requirements Manual (TRM). Once relocated to the TRM, any future proposed changes will require a safety evaluation and Plant Operations Review Committee review.

The proposed license amendment will also delete the cycle-specific note contained in Tables 3.3-2 and 3.3-4. This is administrative in nature and do not result in changes to plant configuration, operation, accident mitigation, or analysis assumptions. The notes was in effect only during Cycle 12.

Since the systems will not be affected by the proposed changes, there is no impact on the performance of these systems or on the probability or consequences of an accident previously analyzed.

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

There are no new failure modes associated with the proposed changes. Since the plant will continue to operate as designed, the proposed changes will not modify plant responses

to the point where it can be considered a new or different kind of accident.

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

The proposed changes do not have any adverse impact on the protective boundaries nor do they affect the consequences of any accident previously analyzed. The portion of the change associated with Generic Letter 93-08 will not affect the technical specification operability and surveillance requirements which will still ensure that the systems are tested and are within limits. Changing the limits requires a safety evaluation and Plant Operations Review Committee review. This will ensure that the licensing basis is maintained.

The proposed changes to delete the cycle-specific notes are administrative in nature and do not result in changes to plant configuration, operation, accident mitigation, or analysis assumptions. The notes were in effect only during Cycle 12.

Therefore, the proposed changes will not result in a significant reduction in the margin of safety.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are considered not likely to involve a significant hazards consideration. Although the proposed changes are not enveloped by a specific example, the proposed changes would not involve a significant hazards consideration.