

NORTHEAST UTILITIES



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

General Offices • Seiden Street, Berlin, Connecticut

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

August 17, 1992

Docket No. 50-336
B14216

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Containment Structural Integrity

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

Background

The structural integrity of the Millstone Unit No. 2 containment is maintained, as described in Technical Specification 4.6.1.6.1 through 4.6.1.6.4, based on NRC Regulatory Guide (RG) 1.35 "Inservice Inspection of UngROUTed Tendons in Prestressed Concrete Containments." The surveillance requirements for demonstrating the containment's structural integrity are accordingly in compliance with the RG. These surveillances ensure that the containment structural integrity will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the containment vessel will withstand the maximum pressure of 53.8 psig in the event of a loss of coolant accident. The measurement of containment tendon liftoff force, the visual and metallurgical examination of tendons, anchorages and liner, and the Type A leakage tests are sufficient to demonstrate this capability.

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The original Technical Specification Sections 4.6.1.6.1 and 4.6.1.6.2, concerning containment tendons and end anchorages and adjacent concrete surfaces respectively, were based on Regulatory Guide 1.35 Revision 0. The current technical specification sections are based on RG 1.35, Revision 2. Section 4.6.1.6.2 requires a containment surface inspection while the containment is pressurized during the Type A test.

Revision 3 of RG 1.35 reflects the lessons learned from implementing Revision 2. The NRC Staff issued Revision 3 following evaluation of actual inspections performed, the methods of implementing Revision 2, and the feedback from licensees related to difficulty in implementing Revision 2. Revision 3 deleted the requirement to conduct the surface inspection at pressure.

Description of Proposed Changes

The proposed Technical Specification changes to Sections 4.6.1.6.1 and 4.6.1.6.2 are intended to make the Technical Specifications consistent with the latest revision to the RG. The Millstone Unit No. 2 Inservice Inspection (ISI) Program currently requires containment tendon surveillance in accordance with RG 1.35, Revision 3.

Section 4.6.1.6.1a discusses the selection of the number and type of tendons to be inspected. The change is intended to more accurately represent the method of selecting the tendons which are required to be inspected. The current wording "... may be reduced to a representative sample ..." is proposed to be changed to "... may be reduced to a representative random sample..."

Section 4.6.1.6.2 discusses inspection of end anchorages and adjacent concrete surfaces. This change is intended to clarify the surface visual inspection consideration and delete the requirement to conduct the surface inspection during the time when the containment is at the Type A test pressure. The current wording "...adjacent concrete surfaces shall be demonstrated by determining through inspection that no apparent changes have occurred in the visual appearance of the end anchorage concrete exterior surfaces or the concrete crack patterns adjacent to the end anchorages." is proposed to be changed to "...adjacent concrete surfaces shall be demonstrated by determining through inspection that no apparent degradation has occurred in the visual appearance of the end anchorage concrete exterior surfaces or as indicated by the concrete crack patterns adjacent to the end anchorages." In the same section, the reference to performing the surface inspection while the containment is at test pressure is proposed to be changed from "Inspections of the concrete shall be performed during the Type A containment leakage rate tests (reference Specification 4.6.1.2) while the containment is at its maximum test pressure." is proposed to be changed to "Inspections of the concrete shall be performed concurrent with the containment tendon surveillance (reference Specification 4.6.1.6.1)."

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.90, and has concluded that the change does not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 10CFR50.92(C) are not compromised. The proposed change does not involve a significant hazards consideration because the change would not:

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

The proposed change will reduce the duplication of inspection performed during an IIRT and that performed during the scheduled tendon surveillance inspections, while providing a more accurately represented selection of tendons for testing and inspection. As such this change will not increase the probability or consequences of an accident previously evaluated.

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

The changes to RG 1.35 Revision 3 were based on experience derived from previous inspections performed under RG 1.35. Reducing duplication of work, based on previous experience, and establishing a more comprehensive tendon selection will not create the possibility of a new or different kind of accident.

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

Since the proposed change is based on RG 1.35 Revision 3, it will provide a more accurate representation of tendon condition and conformance of performance to anticipated design. Further, it will reduce inspection duplication and will not reduce the margin of safety.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51 FR 7751) of amendments that are considered not likely to involve a significant hazards consideration. The change proposed herein is not enveloped by a specific example. As described above, the proposed change does not constitute a significant hazards consideration in that the change does not involve a significant increase in the probability of occurrence or consequences of an accident previously analyzed, does not create the possibility of a new or different kind of accident, and does not involve a reduction in a margin of safety.

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 actions, and the proposed

license amendment will not have a significant effect on the quality of the human environment.

The Millstone Unit No. 2 Nuclear Review Board has reviewed the proposed change and has concurred with the above determination.

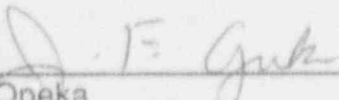
Regarding our schedule for this amendment, we request issuance at your earliest convenience with the amendment effective within 30 days of issuance.

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

If you have questions regarding this amendment, please contact my staff.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



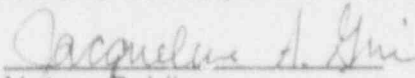
J. F. Opeka
Executive Vice President

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

Mr. Kevin McCarthy, Director
Radiation Control Unit
Department of Environmental Protection
Hartford, CT 06106

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY 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.



Notary Public

Jacqueline A. Grier
Notary Public
My Commission Expires Dec. 31, 1995