

WESTERN MASSACHUSETTS ELECTRIC COMPANY HOLVORE WATER POWER COMPANY NORTHEAST UTUITES SERVICE COMPANY NORTHEAST INJULEAR ENERGY COMPANY General Offices • Seldon Street, Berlin, Connecticut

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April 2, 1985

Docket No. 50-336 B11503

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2 Proposed Revision to Technical Specifications Control Room Habitability Modifications

Pursuant to 10 CFR 50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, DPR-65, by incorporating the attached proposed changes into the Millstone Unit No. 2 Technical Specifications.

The proposed technical specification revisions are provided as Attachment 1. The proposed changes include a change (from 5 ppm to 1 ppm) to the chlorine detection system setpoints in Technical Specification Section 3.3.3.6, elimination of the date associated with Regulatory Guide 1.95 in Technical Specification Bases Section 3/4.3.3.6, a change to Technical Specification Section 4.7.6.1 concerning control room emergency ventilation system flow rate (changed to 2500 cfm from 2000 cfm), and insertion of control room monitoring information on Technical Specification Tables 3.3-6 and 4.3-3.

These proposed technical specification revisions lower the chlorine concentration trip setpoint for the control room chlorine detectors. In addition, they increase the required filtered air flow rates to 2500 SCFM, along with increasing the required efficiency of the charcoal absorbers. Finally, they incorporate new area radiation monitors, on the control room inlet ducting, into the required instrumentation section of the Technical Specifications.

The proposed technical specification revisions are a result of NNECO's responses to the requirements of Item III.D.3.4 in NUREG-0737 regarding control room habitability. The proposed modifications ensure the control room remains below toxic levels during an on-site accident involving chlorine and ensure control room operator doses are below levels set forth in 10 CFR 50 Appendix A - General Design Criterion 19. The Staff, in the Safety Evaluation concerning NUREG-0737 Item III.D.3.4 (dated July 19, 1982), stated that they concurred with NNECO's proposed modifications.

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NNECO has reviewed the attached proposed changes pursuant to 10 CFR 50.59 and has determined that they do not constitute unreviewed safety questions. Specifically, the margins of safety as defined in the Technical Specification Bases are maintained. In addition, the probability of occurrence or the consequences of a previously analyzed accident have not been increased and the possibility for a new type of accident not previously evaluated has not been created. The proposed changes are an improvement in the ability to minimize the dose to the control room operators following events having radiological consequences and accidents involving toxic substances (chlorine) at the Millstone site. The proposed revisions will not adversely affect the safety or health of the public and, in fact, represent an improvement to a safety-related system.

NNECO has reviewed the proposed changes, in accordance with 10 CFR 50.92, and has concluded that they do not involve a significant hazards consideration. The basis for this conclusion is that the criteria of 10 CFR 50.92(c) are not compromised, a conclusion which is supported by our determinations made pursuant to 10 CFR 50.59. Additionally, the Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870, April 6, 1983). One of these examples, (ii), of actions not likely to involve a significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications: for example, a more stringent surveillance requirement. The proposed technical specification revisions lower the chlorine concentration trip setpoint for the control room chlorine detectors, increase the required control room emergency filter air flow rate to 2,500 cfm, and increase the required efficiency of the charcoal absorber. In addition, new radiation detectors, on the control room HVAC air intake, are provided for isolation of the control room. These detectors protect the Millstone Unit No. 2 control room operators from accidents which occur at the Millstone site. These changes are similar to example (ii), described above, in that the changes provide a more stringent requirement on the chlorine detectors trip setpoint and an additional control, concerning control room radiation monitor, not presently included in the Technical Specifications.

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

In accordance with 10 CFR 50.91(b), NNECO is providing the State of Connecticut a copy of this proposed amendment.

Pursuant to the requirements of 10 CFR 170.12(c), enclosed with this amendment request is the application fee of \$150.00. In order to support startup

requirements, from the current Millstone Unit No. 2 outage, NNECO requests a response to this letter by May 27, 1985. My staff remains available to assist you in your review of this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil Senior Vice President

cc: Mr. Kevin McCarthy Director, Radiation Control Unit Department of Environmental Protection Hartford, CT 06116

STATE OF CONNECTICUT)) ss. COUNTY OF HARTFORD)

) ss. Berlin

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, 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.

My Commission Expires March 31, 1988