Northeast
Utilities System

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Northeast Utilities Service Company
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MAR 28 1996

Docket No. 50-336
B15464

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 2
Proposed Technical Specifications Revision
Sealed Source Contamination

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, DPR-65, by incorporating the attached changes into the Technical Specifications of Millstone Unit No. 2. The proposed changes affect Technical Specification Section 3.7.7, "Sealed Source Contamination," and its Bases.

The changes make the criteria for testing sealed sources for contamination and leakage at the Millstone Unit No. 2 the same as those at Millstone Unit No. 3, the Haddam Neck Plant and Seabrook Station.

Attachment 1 to this letter provides a safety assessment of 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 is 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 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 effluent 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 has reviewed the proposed change to the Technical Specifications and concurs with the above determinations. In accordance with 10CFR50.91(b), NNECO is

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providing the State of Connecticut with a copy of this proposed license amendment.

NNECO is requesting NRC review and approval at your earliest convenience, with the amendment to be implemented within 60 days of issuance.

There are no commitments contained within this letter. If the NRC Staff should have any questions or comments regarding this submittal, please contact Mr. Gerard P. van Noordennen at (860) 440-2084.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

F. R. Dacimo
Vice President - Nuclear Operations

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 No. 2

Mr. Kevin T.A. McCarthy, Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Subscribed and sworn to before me

this 28th day of March, 1996

Notary Public

Date Commission Expires: 8/31/98

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision
Sealed Source Contamination

Safety Assessment of Proposed Changes

March 1996

Millstone Nuclear Power Station, Unit No. 2
Proposed Technical Specifications Revision
Sealed Source Contamination
Safety Assessment of Proposed Changes

Description of Proposed Changes

The proposed change to Technical Specification Section 3.7.7, "Sealed Source Contamination," makes the criteria for testing sealed sources for contamination and leakage at Millstone Unit No. 2 the same as those at Millstone Unit No. 3, the Haddam Neck Plant and Seabrook Station. Specifically, the sealed sources that are required to be free of greater than or equal to 0.005 microcuries of removable contamination are those that will exceed "100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material." The Bases Section 3/4.7.7, "Sealed Source Contamination," is being changed to reference the appropriate section of 10CFR70.39.

Safety Assessment

The criteria for testing sealed sources for contamination and leakage at Millstone Unit No. 2 is proposed to be the same as those at Millstone Unit No. 3, the Haddam Neck Plant and Seabrook Station. Specifically, the sealed sources that are required to be free of greater than or equal to 0.005 microcuries of removable contamination are those that will exceed "100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material." The source leak test criteria for the NRC license for the Northeast Utilities Dosimetry Laboratory are the same as Millstone Unit No. 3, the Haddam Neck Plant and Seabrook Station with the exception that the size of an alpha emitting source requiring leak testing is 10 microcuries rather than 5 microcuries.

Although the change may appear to be large (as high as a factor of 1,000 for some radionuclides), the actual radiological material content of a sealed source which will require routine leak testing is still small so the actual change is minor. Currently, Millstone Unit No. 3, the Haddam Neck Plant, and Seabrook Station use the criteria of "100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material." Since the criteria are authorized and considered safe for these plants, it is also safe for Millstone Unit No. 2. This change does not affect any of the plant protective boundaries.

The proposed change to the Bases Section does not involve an unreviewed safety question and is safe.

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision
Sealed Source Contamination

Determination of No Significant Hazards Considerations

March 1996

Millstone Nuclear Power Station, Unit No. 2
Proposed Technical Specifications Revision
Sealed Source Contamination
Determination of No Significant Hazards Considerations

Pursuant to 10CFR50.92, NNECO has reviewed the proposed changes and concludes that the changes do not involve a significant hazards consideration (SHC) since the proposed changes satisfy the criteria in 10CFR50.92(c). That is, the proposed changes do not:

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

   The changes make the criteria for testing sealed sources for contamination and leakage at Millstone Unit No. 2 the same as those at Millstone Unit No. 3, the Haddam Neck Plant and Seabrook Station. Although the leakage criteria for sealed sources that are to be tested is being changed, the allowable leakage remains small. Any leakage that is identified would not cause a significant radiation exposure. The source storage area is routinely surveyed by Health Physics in accordance with Health Physics Department procedures and any significant leakage would be detected. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   The proposed change in the criteria for testing sealed sources for contamination and leakage will not change the way the sources are used. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

   The possible radiation exposure to both the workers and the public from this change is very small. All protective systems which would detect any release of material from the site remain in place so there is no reduction in safety for the public. Likewise, all protective systems for the workers remain in place. Workers using the sources routinely pass through the whole body contamination monitors. In addition, the source storage areas are surveyed routinely by Health Physics in accordance with Health Physics Department procedures, and any significant leakage would be detected. The bases section is being revised to reference the

appropriate section of 10CFR70.39. Therefore, there is no significant reduction in a 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 an SHC. The proposed change described herein is not enveloped by a specific example. However, it has been demonstrated that the proposed change does not involve an SHC. Therefore, the proposed change does not negatively impact the public health or safety.