

WESTERN MASSACHUSETTS ELECTRIC COMPANY

HOLYOKE WATER POWER COMPANY

NORTHEAST UTLITIES SERVICE COMPANY

ORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

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March 1, 1988

Docket No. 50-423 B12834 Re: 10CFR50.90

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555

Gentlemen:

8803070237 PDR ADOCK 880301 05000423 DCD

## Millstone Nuclear Power Scation, Unit No. 3 Proposed Revision to Technical Specifications Administrative Controls

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) proposes to amend its license for Millstone Unit No. 3 by incorporating the attached proposed changes into the plant Technical Specifications.

The proposed changes to Technical Specification Sections 6.2.3.1 and 6.2.3.4 will clarify that Independent Safety Engineering Group (ISEG) recommendations, records and reports are provided to appropriate station and corporate management. The Vice President-Nuclear and Environmental Engineering does not need to be the sole corporate management contact for ISEG. Many recommendations and reports are more appropriately directed toward station management or other corporate management personnel.

It is noted that this proposed change is similar to existing Technical Specifications for Hope Creek 1 (Docket No. 50-354).

## 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 for this conclusion is that the three criteria cf 10CFR50.92(c) are not compromised; a conclusion which is supported by our determinations discussed below. The proposed changes do not involve a significant hazards consideration because the changes do not:

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

The proposed changes are strictly administrative. There is clearly no significant increase in the probability of any accident nor the possibility of creating a new kind of accident. The proposed changes will have no affect on any design basis accident.

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U.S. Nuclear Regulatory Commission B12834/Page 2 March 1, 1988

2. Create the possibility of a new or different kind of accident from any previously evaluated. The proposed changes do not affect safety systems or components and, therefore do not affect any design basis accident. The proposed changes have no impact on the probability of occurrence of any design basis accident. Since no safety systems are affected by the proposed changes, there can be no effect on the probability of failure of any safety system.

The proposed Technical Specification change request is administrative in nature and does not change the scope, organization, or independence of the ISEG.

Therefore, the proposed Technical Specification changes do not create the probability of an accident or malfunction of a new or different type than any evaluated previously in the safety analysis report.

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

Since the proposed changes do not have any impact on any design basis accident, there can be no impact on any protective boundary. Since there is no impact on any protective boundary as a result of the proposed changes, there can be no impact on any safety limit. The proposed changes have no impact on the basis of any Technical Specification.

The proposed changes are appropriate to insure that proper line management, who have responsibility and accountability to address ISEG recommendations, receive them, and disposition them in a timely manner.

Moreover, the Commission has provided guidance concerning the applications of standards set forth in 10CFR50.92 by providing certain examples (March 6, 1986, <u>FR</u> 7751) of amendments that are considered not likely to involve a significant hazards consideration. The changes proposed herein are most closely enveloped by example (i), a purely administrative change to the Technical Specifications. The proposed changes will clarify that ISEG recommendations, records and reports are provided to appropriate station and corporate management.

Based on the information contained in this submittal and the environmental assessment for Millstone Unit No. 3, there are no significant radiological or non-radiological impacts associated with the proposed action, and that the proposed license amendment will not have a significant effect on the quality of the human environment.

The Millstone Site Nuclear Review Board has reviewed and approved the attached proposed revision and concurs with the above determinations.

In accordance with 10CFR50.91(b), NNECO will provide the State of Connecticut with a copy of this proposed amendment.

U.S. Nuclear Regulatory Commission B12834/Page 3 March 1, 1988

Pursuant to the requirements of 10CFR170.12(c), enclosed with this amendment request is the application fee of \$150.00.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Mroczka

Senior Vice President

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

W. T. Russell, Region I Administrator

R. L. Ferguson, NRC Project Manager, Millstone Unit No. 3

W. J. Raymond, Senior Resident Inspector, Millstone Unit No. 3

STATE OF CONNECTICUT ) ) ss. Berlin COUNTY OF HARTFORD )

Then personally appeared before me E. J. Mroczka, who being duly sworn, did state that he is Senior 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.

1 amies Notary

My Commission Expires March 31, 1988

Docket No. 50-423 B12834

Attachment 1

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Millstone Unit No. 3 Proposed Revision to Technical Specifications

March, 1988