

NORTHEAST UTILITIES



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

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HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

August 2, 1988

Docket No. 50-336

B12957

Re: 10CFR50.90

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

Gentlemen:

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

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating Licensing, DPR-65, by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 2.

The present snubber test resampling plan for Millstone Unit No. 2 requires that for each snubber which does not meet the test acceptance criteria, an additional 10 percent of that type of snubber be tested. The proposed change to the Technical Specifications would decrease the resampling size to 5 percent.

ASME O&M-4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints," is a recently approved standard covering the inspection and testing of snubbers. This proposed change in the Millstone Unit No. 2 Technical Specifications would make the surveillance requirements of Section 4.7.8.c consistent with the 10 percent plan in ASME O&M-4, providing a sufficient level of confidence in the reliability of the snubber population.

The Technical Specification section affected by this proposed change is Surveillance Requirement 4.7.8.c on page 3/4 7-22. The reference to "an additional 10 percent of that type" would be changed to "an additional 5 percent of that type."

The proposed change would provide consistency among the snubber sampling plans for all four nuclear power plants operated by Northeast Utilities. The Technical Specifications for Millstone Unit No. 3 were approved with a 5 percent resampling on the 10 percent plan, prior to operation, and similar

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U.S. Nuclear Regulatory Commission
B12957/Page 2
August 2, 1988

changes have recently been approved by the Staff for Millstone Unit No. 1 and the Haddam Neck Plant.

NNECO has reviewed the attached proposed change in accordance with 10CFR50.92 and has concluded that it does not involve a significant hazards consideration in that this change would not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously analyzed. The change is consistent with the conclusions of the ASME O&M-4 evaluation which asserted that a retest of 50 percent of the original sample (i.e., 5 percent sample size of that type of snubber) provided adequate conservatism associated with snubber surveillance testing.
2. Create the possibility of a new or different kind of accident from any previously analyzed. There are no hardware modifications associated with this change, which addresses only surveillance requirements and involves no failure modes.
3. Involve a significant reduction in a margin of safety. There would be no reduction in the reliability of the safety systems using snubbers. The proposed change has no impact on operation of the snubbers, but only reduces the percentage of retested snubbers in the event of a tested snubber failing to meet acceptance criteria.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986: 44FR7751) of amendments that are considered not likely to involve a significant hazards consideration. These changes have previously been incorporated in the Technical Specifications of Millstone Unit Nos. 1 and 3 and the Haddam Neck Plant, and provide a level of protection equivalent to the present industry standard, ASME O&M-4. The proposed change thus most closely resembles (i), a purely administrative change to technical specifications; for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature.

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

In accordance with 10CFR50.91(6), NNECO is providing the State of Connecticut with a copy of this proposed amendment.

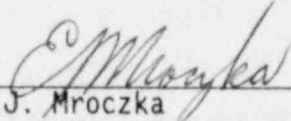
Pursuant to 10CFR170.12(c), enclosed with this amendment request is the application fee of \$150.

U.S. Nuclear Regulatory Commission
B12957/Page 3
August 2, 1988

Please contact us if you have any questions.

Very truly yours,

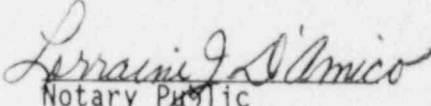
NORTHEAST NUCLEAR ENERGY COMPANY


E. J. Mrocza
Senior Vice President

cc: W. T. Russell, Region I Administrator
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 2
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

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

Then personally appeared before me, E. J. Mrocza, 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 Licensees herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.


Notary Public
My Commission Expires March 31, 1993

Docket No. 50-336
B12957

Attachment 1

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

August 1988