Mr. Martin L. Bowling
Recovery Officer - Technical Services
Northeast Nuclear Energy Company
c/o Ms. Patricia A. Loftus
Director - Regulatory Affairs
P.O. Box 128
Waterford, CT 06385

SUBJECT:

REQUEST FOR ADDITIONAL INFORMATION REGARDING TECHNICAL SPECIFICATION AMENDMENT REQUEST - MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2 (TAC NO. MA2340)

Dear Mr. Bowling:

By letter dated July 21, 1998, Northeast Nuclear Energy Company requested a Technical Specification (TS) amendment that would change the TS for the Reactor Protection System (RPS) and the Engineered Safety Features Actuation System (ESFAS) instrumentation by relating to various setpoints and allowable values; correct the specified maximum reactor power level limited by the high power level RPS trip; add new TS, and requirements associated with the automatic isolation of steam generator blowdown; and make several editorial corrections.

The NRC staff has completed a preliminary review of your request and has identified issues that require additional information. Please respond to the enclosed request for additional information within 30 days from receipt of this letter in order for the staff to complete its review.

Sincerely,

Original signed by:

Daniel G. McDonald Jr., Senior Project Manager Millstone Project Directorate Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosure: As stated

cc w/encl: See next page

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## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 16, 1998

Mr Martin L. Bowling
Recovery Officer - Technical Services
Northeast Nuclear Energy Company
c/o Ms. Patricia A. Loftus
Director - Regulatory Affairs
P.O. Box 128
Waterford, CT 06385

SUBJECT:

REQUEST FOR ADDITIONAL INFORMATION REGARDING TECHNICAL SPECIFICATION AMENDMENT REQUEST - MILLSTONE NUCLEAR POWER

STATION, UNIT NO. 2 (TAC NO. MA2340)

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Sincerely,

Daniel G. McDonald Jr., Senior Project Manager

Millstone Project Directorate

Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosure: As stated

cc w'encl: See next page

Millstone Nuclear Power Station Unit 2

CC:

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Mr. M. H. Brothers Vice President - Operations Northeast Nuclear Energy Company P.O. Box 128 Waterford, CT 06385

Mr. J. A. Price Director - Unit 2 Northeast Nuclear Energy Company P.O. Box 128 Waterford, CT 06385 Millstone Nuclear Power Station Unit 2

CC:

Mr. B. D. Kenyon (Acting)
Chief Nucler Officer - Millstone
Northeast Nuclear Energy Company
P.O. Box 128
Waterford, CT 06385

Citizens Regulatory Commission ATTN: Ms. Susan Perry Luxton 180 Great Neck Road Waterford, CT 06385

Deborah Katz, President Citizens Awareness Network P. O. Box 83 Shelburne Falls, MA 03170

The Honorable Terry Concannon Co-Chair Nuclear Energy Advisory Council Room 4035 Legislative Office Building Capitol Avenue Hartford, CT 96106

Mr. Evan W. Woollacott Co-Chair Nuclear Energy Advisory Council 128 Terry's Plain Road Simsbury, CT 06070

Little Harbor Consultants, Inc. Millstone - ITPOP Project Office F. O. Box 0630 Niantic, CT 06357-0630

Mr. Daniel L. Curry Project Director Parsons Power Group Inc. 2675 Morgantown Road Reading, F-A 19607 Attorney Nicholas J. Scobbo, Jr. Ferriter, Scobbo, Caruso, Rodophele, PC 1 Beacon Street, 11th Floor Boston, MA 02108

Mr. J. P. McEiwain Recovery Officer - Millstone Unit 2 Northeast Nuclear Energy Company P. O. Box 128 Waterford, Connecticut 06385

## REQUEST FOR ADDITIONAL INFORMATION

## MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

## **DOCKET NO. 50-336**

1. The NRC staff has not reviewed or approved the ISA-RP67.04, Part II,1994 Standard. The approved standard, which provides guidance for setpoint (SP) calculations for instrumentation in safety-related systems, is ISA 67-04, 1982, which has been endorsed by the NRC staff in Regulatory Guide 1.105, Rev. 2.

Please confirm the following, since the SP methodology used by Northeast Nuclear Energy Company (NNECO) is based on ISA-RP67.04, Part II, 1994 Standard, which has not yet been approved by the NRC:

- (a) That the methodology used by NNECO treats all elements of the instrument loop uncertainties in the same way that is prescribed by the 1982 version of the ISA standard.
- (b) That the selected nominal SP will always initiate the required mitigating action(s) prior to the monitored variable encroaching its analytical limit when considering all elements of instrument uncertainties and the response time of the actuated equipment/system. Please provide a description of the allowable value (AV) and its development with respect to the analytical limit and trip SP.
- (c) That the calculation of the AV is consistent with the channel functional test and calibration surveillance requirements in that the uncertainty terms included in the AV calculation are representative of the associated component uncertainties under test. (Reference IEEE-338)
- 2. The current surveillance frequency at the Millstone Nuclear Power Station, Unit No. 2, is 18 months. However, as noted in the submittal, the revised SP calculations are based on 24 months drift, which is conservative with regard to SP determination. Please confirm that the surveillance-test-acceptance criteria for the 18-month surveillance test is compatible to the drift-values used in SP calculations. Please note that the staff's review of the referred submittal is limited to revised SP/AV calculations only and does not include areas relating to extending surveillance frequency from 18 months to 24 months including drift extension methodology.