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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

September 8, 1988

Docket No. 50-336
B13020
Re: 10CFR50.90

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

Gentlemen:

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

In an August 2, 1988 letter,(1) Northeast Nuclear Energy Company (NNECO) submitted a license amendment change request on behalf of Millstone Unit No. 2. This request would revise the surveillance requirement for snubbers contained in Technical Specification 4.7.8.c from a 10 percent resampling size to a 5 percent resampling size.

In our August 2, 1988 request, we justified our conclusion that this change did not involve a significant hazards consideration. Furthermore, we indicated that this change most closely resembled example (i), a purely administrative change, listed in 54FR7751 (March 6, 1986). Upon further consideration, NNECO has decided that a more appropriate example to demonstrate that no significant hazards consideration exists for this proposed change would be example (vi), a change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

In response to the NRC Staff's verbal request, NNECO hereby provides additional information to support our no significant hazards consideration determination. The proposed license amendment does not involve a significant hazards consideration in that this change would not:

1. Involve a significant increase in the probability of a previously evaluated accident, nor would there be a significant increase in the consequences of such an accident. With the smaller resample rate of the snubber population (a change from 10 percent resampling to 5 percent

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(1) E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Proposed Revision to Technical Specification," dated August 2, 1988, B12957.

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resampling) there would be slightly less chance of finding as many inoperable snubbers, however, industry experience, as a whole, has shown that pipe failure does not occur as a result of inoperable snubbers. Research results indicate that even with many inoperable snubbers, a typical piping system can withstand accelerations many times higher than design basis levels. Further, the mode of pipe failure is typically slight deformation which would not affect accident consequences. Also, as the industry and plant gain experience, the rate of occurrence of inoperable snubbers is expected to drop. Industry and regulatory requirements have been amended to allow the reduced resample rate noted above (e.g., incorporation of O&M-4 into ASME XI, NRC license amendments at various plants including Millstone Unit No. 1 and the Haddam Neck Plant).

Thus, with the chances of pipe failure due to an inoperable snubber being so low initially, it is concluded that the change does not represent a significant increase in the probability or consequences of an accident.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated. No new or different kinds of accidents are created by reducing the resampling rate.

3. Involve a significant reduction in safety margin. Although the change could possibly result in a reduction in safety margin if inoperable snubbers were not discovered, the reduction is not considered significant. Industry experience has shown that piping does not normally fail as a result of inoperable snubbers.

NNECO trusts that this submittal adequately addresses the Staff's concerns.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka
Senior Vice President

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

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