

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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September 13, 1988

Docket No. 50-336

B13017

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
Steam Generator Tube Inspection Acceptance Criteria

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 proposed change would clarify the intent of Technical Specification 4.4.5.1.4.a.8 regarding the extent and origination point of steam generator tube examinations. The existing technical specification calls for examination of steam generator tubing originating from the hot leg side. The proposed change would add the cold leg side as an alternate point of entry.

The proposed change will allow steam generator tube inspections performed from either the hot leg side or the cold leg side to the tube end on the opposite side to be considered valid tube inspections. The proposed change will also optimize the inspection pattern to minimize inspection time and personnel radiation exposure.

The intent of Regulatory Guide 1.83 (as it applies to this proposed change) is to ensure that the hot leg and U-bend segments of the tube will be inspected. The proposed change will meet this intent. Inspection of the hot leg and U-bend tube segments can be accomplished from either the hot leg side or cold leg side. From the cold leg, the probe must be inserted through the tube to the hot leg tube end to accomplish this coverage. From the hot leg side, the probe must be inserted to at least the highest cold leg support. Therefore, an inspection from either the hot leg side or cold leg side to the tube end on the opposite leg will provide the coverage specified by Regulatory Guide 1.83.

The choice of entry side has no adverse effect on the inspection capability or result. Eddy current probe response to imperfections is not dependent on the

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entry side selected. Therefore, inspections performed from the hot leg side are equivalent to inspections performed from the cold leg side.

NNECO has reviewed the proposed change in accordance with the requirements of 10CFR50.92 and has determined it does not involve a significant hazards consideration. Specifically, the proposed change does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change will only affect the criteria which defines an acceptable tube inspection. The change will allow tube inspections to be performed by inserting the probe into either the hot leg or cold leg side of the steam generator. The requirement that the tube be inspected from the hot leg side completely around the U-bend to the top support of the cold leg is not changed, and the inspections will continue to meet the intent of Regulatory Guide 1.83. Therefore, there can be no impact on the consequences of any accident and since the ability to detect steam generator tube degradation is not affected, there is no increase in probability of a steam generator tube rupture.
2. Create the possibility of a new or different kind of accident. The proposed change has no impact on plant response and does not introduce any new failure modes. Thus, a different type of accident is not possible.
3. Involve a significant reduction in any margin of safety. As discussed above, the change has no impact on the consequences of any accident. Furthermore, since no changes are proposed to any acceptance criteria related to tube defects, there is no impact on the integrity of the reactor coolant pressure boundary.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986). The change proposed herein does not conform to any of the above mentioned examples. However, NNECO has determined that the proposed change does not involve a significant hazards consideration, in that the proposed change clarifies the technical specification definition of a valid examination technique.


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

In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President

