

Northeast
Nuclear Energy

Rope Ferry Rd. (Route 156), Waterford, CT 06385

Millstone Nuclear Power Station
Northeast Nuclear Energy Company
P.O. Box 128
Waterford, CT 06385-0128
(860) 447-1791
Fax (860) 444-4277

The Northeast Utilities System

DEC 22 1998

Docket No. 50-245

50-336

50-423

B17572

RE: 10 CFR 50.90

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

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Proposed Revision to Technical Specifications
Section 6, "Administrative Controls"

The purpose of this letter is to request NRC review and approval of proposed changes to Section 6.0, "Administrative Controls," of the Technical Specifications for Millstone Unit Nos. 1, 2, and 3.

Description of the Proposed Change

Northeast Nuclear Energy Company (NNECO) has and plans to continue to make changes to its nuclear organization to improve the effectiveness and efficiency of its operation. Some of these organizational changes involve changes to titles that are contained in Section 6.0, "Administrative Controls," of the Technical Specifications.

In order to gain flexibility in making organizational changes without the need for a license amendment, NNECO proposes to replace specific titles in Section 6.0 of the Technical Specifications of all three Millstone units with generic titles. The specific titles with their corresponding Technical Specification responsibilities will be relocated to the Northeast Utilities Quality Assurance Plan (NUQAP) Topical Report. Additionally, the detailed organizational structure at Millstone will be located in the NUQAP Topical Report or be located in administrative procedures. NNECO believes this approach is consistent with the philosophy in NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

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The proposed changes will modify the following sections of the Technical Specifications:

Summary of Affected Sections		
Millstone Unit 1	Millstone Unit 2	Millstone Unit 3
6.1.1	6.1.1	6.1.1
6.1.2	6.1.2	6.1.2
6.1.3	6.1.3	6.1.3
6.2.1	6.2.1b, c	6.2.1b, c
6.4.1	6.4	6.4
6.5.1, 6.5.1.1, 6.5.1.2, 6.5.1.6a, 6.5.1.6e, 6.5.1.7a, 6.5.1.7b, 6.5.1.8	6.5.1, 6.5.1.1, 6.5.1.2, 6.5.1.6a, 6.5.1.6e, 6.5.1.7a, 6.5.1.7b, 6.5.1.8	6.5.1, 6.5.1.1, 6.5.1.2, 6.5.1.6a, 6.5.1.6e, 6.5.1.7a, 6.5.1.7b, 6.5.1.7h, 6.5.1.8
6.5.2, 6.5.2.1, 6.5.2.2, 6.5.2.6a, 6.5.2.7, 6.5.2.8	6.5.2, 6.5.2.1, 6.5.2.2, 6.5.2.6a, 6.5.2.7a, 6.5.2.7b, 6.5.2.8	6.5.2, 6.5.2.1, 6.5.2.2, 6.5.2.6a, 6.5.2.7a, 6.5.2.7b, 6.5.2.8
6.5.3, 6.5.3.1, 6.5.3.2, 6.5.3.3, 6.5.3.6, 6.5.3.7, 6.5.3.7g, 6.5.3.8	6.5.3, 6.5.3.1, 6.5.3.2, 6.5.3.3, 6.5.3.6, 6.5.3.7, 6.5.3.7g, 6.5.3.8, 6.5.3.8b, c	6.5.3, 6.5.3.1, 6.5.3.2, 6.5.3.3, 6.5.3.6, 6.5.3.7, 6.5.3.7g, 6.5.3.8
6.5.4, 6.5.4.1, 6.5.4.4	6.5.4, 6.5.4.1, 6.5.4.4	6.5.4, 6.5.4.1, 6.5.4.4
6.6, 6.6.1b	6.6, 6.6.1b	6.6, 6.6.1b
6.8, 6.8.2a, b, c, 6.8.3c	6.8, 6.8.2a, b, c, 6.8.3c	6.8, 6.8.2a, b, c, 6.8.3c
6.15	6.15, 6.15.b	6.13, 6.13b

Safety Summary

The organization at Millstone is being modified to improve operational focus. Unit specific titles for the functions and responsibilities associated with generic titles in Section 6.0 of the respective Technical Specifications will be identified in the Northeast Utilities Quality Assurance Program (NUQAP) Topical Report. Additionally, the detailed organizational structure at Millstone will be located in the NUQAP Topical Report or be located in administrative procedures. The proposed change is considered administrative in nature and no system, structure, or component is affected by this change. In addition, the change has been evaluated to insure that the responsibilities for safe plant operation, including emergency preparedness, physical security, fire protection and quality assurance are properly delegated.

Based on a 10 CFR 50.59 safety evaluation performed for this change, the implementation of this Technical Specification change does not involve an Unreviewed Safety Question. The change is administrative only and replaces specific titles for responsible individuals with generic titles. The authorities, responsibilities and qualification requirements of individuals responsible for safe operation of the plant are not changed.

Significant Hazards Consideration

In accordance with 10 CFR 50.92, NNECO has reviewed the attached proposed changes and have concluded that they do not involve a Significant Hazard Consideration (SHC). The basis for this conclusion is that the three criterion of 10 CFR 50.92 are not compromised. The proposed change is not a SHC because the proposed change will not:

1. involve a significant increase in the probability or consequences of an accident previously evaluated.

No design basis accidents are affected by these proposed changes. The proposed changes are administrative in nature and are being proposed to eliminate the need for a Technical Specification change each time there is a change in the organization.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

There are no changes in the way the plant is operated due to these administrative changes. The potential for an unanalyzed accident is not created. There is no impact on plant response, and no new failure modes are introduced. The proposed administrative and editorial changes have no impact on safety limits or design basis accidents, and have no potential to create a new or unanalyzed event.

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

These changes do not directly affect any protective boundaries nor do they impact the safety limits for the protective boundaries. These proposed changes are administrative and editorial in nature. Therefore there is no reduction in the margin of safety.

The commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (51 FR 7751, March 4, 1986) of amendments that are considered not likely to involve an SHC. The changes proposed herein are enveloped by example (I), since they are purely administrative changes to the Technical Specifications to reflect organizational title changes and to achieve consistency throughout the Technical Specifications at Millstone Unit Nos. 1, 2, and 3.

Environmental Consideration

NNECO has reviewed the proposed Technical Specification change against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not increase the type and amounts of effluents that may be released off site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed changes meet the criteria delineated in 10 CFR 51.22(c)(9) for categorical exclusion from the requirements for an environmental impact statement.

Nuclear Safety Assessment Board/Site Operations Review Committee

The Nuclear Safety Assessment Board and the Site Operations Review Committee have reviewed and have concurred with the above determinations.

State Notification

In accordance with 10 CFR 50.91(b), a copy of this license amendment request is being provided to the State of Connecticut.

Schedule

Regarding our proposed schedule for these amendments, we request issuance at your earliest convenience, with the amendments effective as of the date of issuance, to be implemented within 30 days of issuance. Please note that these proposed administrative changes are consistent with the current organizational alignment.

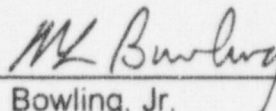
Conclusions

As discussed above, the proposed changes have been determined not to involve an SHC pursuant to the provisions of 10CFR50.92. Additionally, NNECO has determined that the license amendment request meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

Attachment 1 provides the mark-up for the proposed changes, and Attachment 2 provides the retyped pages of the Technical Specifications. The retyped pages are of the issued version of the Technical Specifications.

Should the NRC Staff require any additional information, please contact Mr. David A. Smith at (860) 437-5840.

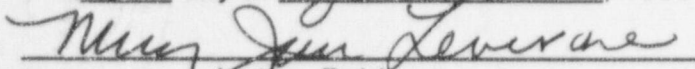
NORTHEAST NUCLEAR ENERGY COMPANY



Martin L. Bowling, Jr.
Recovery Officer - Technical Services

Sworn to and subscribed before me

this 22nd day of December, 1998


Notary Public

My Commission expires _____ MY COMMISSION EXPIRES
JUNE 30, 2002

cc: See Page 5

cc: H. J. Miller, Region I Administrator
L. L. Wheeler, NRC Project Manager, Millstone Unit No. 1
S. Dembek, NRC Project Manager, Millstone Unit No. 2
D. Beaulieu, Acting Senior Resident Inspector, Millstone Unit No. 2
J. W. Andersen, NRC Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Marked Up Pages

December 1998