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Millstone Nuclear Power Station Northeast Nuclear Energy Company P.O. Box 128 Waterford, CT 06385-0128 (860) 447-1791 Fax (860) 444-427?

The Northeast Utilities System

rEB - 3 1999 Docket No. 50-336 B17650

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

Millstone Nuclear Power Station, Unit No. 2 Change in a Statement in the Proposed Revision to Technical Specifications Deletion of the Technical Specification Related to the Hydrogen Purge System

The purpose of this letter is to revise a statement in the proposed revision to Technical Specifications regarding deletion of the Hydrogen Purge Technical Specification, as provided in a letter dated January 18, 1999.⁽¹⁾ The change clarifies the availability of the Hydrogen Purge System, as a backup system to the safety-related Hydrogen Recombiners. Description of the change and explanation of the reason is provided below.

Description of the Change:

In a letter dated January 18, 1999,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) proposed removal of the Technical Specification related to the Hydrogen Purge System from the Millstone Unit No. 2 Technical Specifications and modification of the associated Bases section. The section entitled "Proposed changes in the Licensing Bases," in Attachment 1 of this letter, provides a discussion of the changes in the *Proposed and the pustification of the changes*. The last paragraph in this section, on page 3, states that:

"The purge system will still be available, as necessary, to mitigate severe accident scenarios and will continue to be operated and maintained in accordance with Regulatory Guide (RG) 1.7, Rev. 2 recommendations and the station procedures."

⁽¹⁾ M. L. Bowling to U. S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Deletion of The Technical Specification Related to The Hydrogen Purge System," dated January 18, 1999.

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NNECO is proposing to revise this paragraph to become:

"The purge system, if it remains available post-accident, may be used as necessary for hydrogen control in the event that both hydrogen recombiners fail, an event which is outside the existing licensing bases. The system is operated and maintained in accordance with RG 1.7, Rev. 2 recommendations and the station procedures."

Reason for the Change:

The primary success path for controlling the hydrogen concentration in containment, after a design basis accident (Loss of Coolant Accident), is the Hud nen Recombiner System. The safety-related Hydrogen Recombiner System consists of two trains of Hydrogen Recombiners. The two trains of hydrogen recombiners provide 100% redundancy, as only one recombiner and its associated power supply and control panel is intended to provide 100% of the required hydrogen removal capacity. Each train is capable of performing its functional requirement using onsite or cffsite power. No single failure of an active component in either train will affect the functional capability of the other train or the other subsystems. Therefore, the two trains of hydrogen recombiners completely fulfill the requirements of RG 1.7, Rev. 2, General Design Criterion (GDC) 41 on containment atmospheric cleanup systems, and 10 CFR 50.44 on standards for combustible gas control system in light-water-cooled power reactors. The Hydrogen Purge System, which is not credited in accident mitigation, is the backup for hydrogen control and may only be used in the event that both hydrogen recombiners fail provided that this system remains available post-accident. Failure of the safety-related Hydrogen Recombiner System after a design basis accident is considered an event which is outside the existing licensing bases. The Hydrogen Purge system may not be available post-accident due to loss of any of its supporting components or systems.

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There are no regulatory commitments contained within this letter.

Should you have any questions regarding this submittal, please contact Mr. Ravi G. Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

R. P. Necci Vice President - Nuclear Oversight and Regulatory Affairs

Subscribed and sworn to before me

this 3rd day of Feb , 1999 EDRETTA F. GOODSON

Notary Public Date Commission Expires: Commission Expires November 30, 2001

cc: H. J. Miller, Region I Administrator

S. Dembek, NRC Project Manager, Millstone Unit No. 2

D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

E. V. Imbro, Director, Millstone ICAVP Inspections

Director Bureau of Air Management Monitoring and Radiation Division Department of Environmental Protection 79 Elm Street Hartford, CT 06106-5127