



Northeast  
Nuclear Energy

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The Northeast Utilities System

MAR 17 1999

Docket No. 50-336  
B17704

Re: 10 CFR50.90

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

Millstone Nuclear Power Station, Unit No. 2  
Additional Information Regarding the Proposed Revision to Technical Specifications  
Deletion of the Technical Specification Related to the Hydrogen Purge System

The purpose of this letter is to inform the Nuclear Regulatory Commission (NRC) of Northeast Nuclear Energy Company's (NNECO) intention to continue to maintain the Hydrogen Purge System as a maintenance rule risk significant system even after the NRC approval of the deletion of the Technical Specifications (TS) related to the Hydrogen Purge system from Millstone Unit No. 2 Technical Specifications.

In a letter dated January 18, 1999,<sup>(1)</sup> NNECO proposed to amend Operating License DPR-65 by removing the Technical Specification related to the Hydrogen Purge System from the Millstone Unit No. 2 Technical Specifications. The proposed changes affect Technical Specifications 3/4.6.4.3, "Containment Systems, Hydrogen Purge System." The Bases of the associated Technical Specification are modified to address the proposed changes.

In accordance with subsequent discussions, between the NRC staff and NNECO, NNECO is providing further clarification regarding future maintenance of the Hydrogen Purge system under the maintenance rule risk significant system program. NNECO intends to continue to maintain the Hydrogen Purge System as a maintenance rule risk significant system even after the NRC approval of the deletion of the Technical Specifications (TS) related to the Hydrogen Purge system from Millstone Unit No. 2 Technical Specifications.

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(1) M. L. Bowling to the 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.

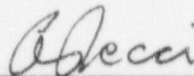
Furthermore, NNECO is revising the discussion on page 5 of Attachment 1 (first bullet under Criterion 4, Reasons) in the above mentioned letter to include the following statement;

"However, since the Hydrogen Purge System is still an integral part of the Emergency Operating Procedures (EOPs), NNECO will continue to maintain the system as a maintenance rule risk significant system as before."

Attachment 1 provides the revised copy of page 5 of Attachment 1 in the above mentioned letter. Attachment 2 contains NNECO commitments associated with this letter. If you should have any questions on the above, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

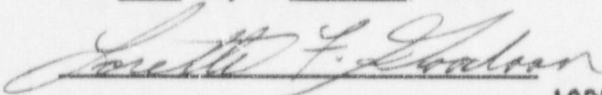
NORTHEAST NUCLEAR ENERGY COMPANY



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

Subscribed and sworn to before me

this 17 day of March, 1998



LORETTA F. GOODSON  
NOTARY PUBLIC

Date Commission Expires: Commission Expires November 30, 2001

Attachments

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

Attachment 1

Millstone Nuclear Power Station, Unit No. 2  
Additional Information Regarding The Proposed Revision to Technical Specifications  
Deletion of The Technical Specification Related to The Hydrogen Purge System  
Revised Page

March 1999



**Reason(s):**

- The primary success path for hydrogen control is the Hydrogen Recombiner System. The Hydrogen Recombiner System has redundant trains and is fully qualified to maintain hydrogen control following a design basis accident. The Hydrogen Purge System is the backup success path for hydrogen control.
- Regulatory Guide 1.7, Revision 2, Section (C), "Regulatory Position" states that the Hydrogen Purge System need not be redundant or designed to Seismic Category I except for those portions of the system which constitute part of the primary containment boundary. The non safety-related portion of the Hydrogen Purge System are the parts located in the enclosure building down stream of the second containment isolation valves, 2-EB-92 and 2-EB-99. These valves, along with their inboard counterparts, 2-EB-91 and 2-EB-100 are controlled by Technical Specification 3.6.3.1.

**Criterion 4 :**

"(D) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety."

**Reason(s):**

- The Hydrogen Purge System is not considered a Maintenance Rule Risk Significant System. The list of maintenance rule risk significant systems was developed, in part, using an expert panel which equates to the operating experience criteria. However, since the Hydrogen Purge System is still an integral part of the Emergency Operating Procedures (EOPs), NNECO will continue to maintain the system as a maintenance rule risk significant system as before.
- MP2 probabilistic risk assessment analyses do not consider the Hydrogen Purge System.
- The Hydrogen Purge System is significant and credited only in Severe Accident Management scenarios. These scenarios are beyond design basis. From 10 CFR 50.36(b):  
"The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to § 50.34."
- Severe accident analyses are not included in either the safety analysis report or its amendments.

Therefore, Technical Specification 3/4.6.4.3 does not fulfill any one or more of the requirements of 10 CFR 50.36c(2)(ii) on items for which Technical Specifications

Attachment 2

Millstone Nuclear Power Station, Unit No. 2  
Additional Information Regarding The Proposed Revision to Technical Specifications  
Deletion of The Technical Specification Related to The Hydrogen Purge System  
List of Commitments

March 1999

Enclosure  
List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Please notify the Manager - Regulatory Compliance at the Millstone Nuclear Power Station Unit No. 2 of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed Date
B17704-01 NNECO intends to continue to maintain the Hydrogen Purge System as a maintenance rule risk significant system even after the NRC approval of the deletion of the Technical Specifications (TS) related to the Hydrogen Purge system from Millstone Unit No. 2 Technical Specifications by updating the Maintenance Rule Scoping Table.	Prior to Mode 2