



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) 444-4217

The Northeast Utilities System

APR 16 1999

Docket No. 50-336

B17772

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Relocation of Selected Technical Specifications Related to Refueling Operations to the
Technical Requirements Manual

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License DPR-65 by incorporating the attached proposed changes into the Millstone Unit No. 2 Technical Specifications. The proposed changes will relocate selected Technical Specifications related to refueling operations and the associated Bases to the Millstone Unit No. 2 Technical Requirements Manual (TRM). These Technical Specifications do not fulfill any one or more of the requirements of 10CFR50.36c(2)(ii) on items for which Technical Specifications must be established. Therefore, these Technical Specifications can be relocated verbatim to the TRM. These changes are consistent with NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants."

The proposed changes affect Technical Specifications 3/4.9.3.2, "Refueling Operations, Spent Fuel Pool Temperature," 3/4.9.3.3, "Refueling Operations, Decay Time," 3/4.9.5, "Refueling Operations, Communications," 3/4.9.6, "Refueling Operations, Crane Operability - Containment Building," 3/4.9.7, "Refueling Operations, Crane Travel - Spent Fuel Storage Pool Building," and Index Pages IX and XIII. The Bases of the associated Technical Specifications will be moved to the TRM and the Technical Specification Bases Section B 3/4.9 will be modified to address the proposed changes.

The relocation of Technical Specifications 3/4.9.3.2, 3/4.9.3.3, 3/4.9.5, 3/4.9.6, 3/4.9.7 and the associated Bases to the TRM will improve the process of changing these specifications. Relocating requirements to NNECO-controlled documents will reduce costs by allowing NNECO to change the requirements without necessarily amending the license.

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Attachment 1 provides a discussion of the proposed changes and the Safety Summary. Attachment 2 provides the Significant Hazards Consideration. Attachment 3 provides the marked-up version of the appropriate pages of the current Technical Specifications. Attachment 4 provides the retyped pages of the Technical Specifications and associated bases.

Environmental Considerations

NNECO has reviewed the proposed License Amendment Request against the criteria of 10CFR51.22 for environmental considerations. The proposed changes will relocate Technical Specifications 3/4.9.3.2, 3/4.9.3.3, 3/4.9.5, 3/4.9.6, and 3/4.9.7 to the Millstone Unit No. 2 TRM, and revise Index Pages IX and XIII. The relocated information will be maintained in accordance with the provisions of 10CFR50.59. These changes will not significantly increase the type and amounts of effluents that may be released offsite. In addition, this amendment request will not significantly increase individual or cumulative occupational radiation exposures. Therefore, NNECO has determined the proposed changes will not have a significant effect on the quality of the human environment.

Conclusions

The proposed changes were evaluated utilizing the criteria of 10CFR50.59 and were determined not to be an unreviewed safety question. Additionally, we have concluded the proposed changes are safe.

The proposed changes do not involve a significant impact on public health and safety (see the Safety Summary provided in Attachment 1) and do not involve a Significant Hazards Consideration pursuant to the provisions of 10CFR50.92 (see the Significant Hazards Consideration provided in Attachment 2).

Plant Operations Review Committee and Nuclear Safety Assessment Board

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

Schedule

We request issuance at your earliest convenience, with the amendment to be implemented within 60 days of issuance.

State Notification

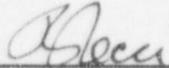
In accordance with 10CFR50.91(b), a copy of this License Amendment Request is being provided to the State of Connecticut.

There are no regulatory commitments contained in 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 16 day of July, 1999

Donna Lynne Williams

Date Commission Expires: 11/30/01

Attachments

cc: H. J. Miller, Region I Administrator
R. B. Eaton, NRC Senior Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2

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

Proposed Revision to Technical Specifications
Relocation of Selected Technical Specifications Related to Refueling Operations to the
Technical Requirements Manual
Discussion of Proposed Changes

July 1999

**Proposed Revision to Technical Specifications
Relocation of Selected Technical Specifications Related to Refueling Operations
to the Technical Requirements Manual
Discussion of Proposed Changes**

Introduction

Northeast Nuclear Energy Company (NNECO) is proposing to relocate selected Technical Specifications related to refueling operations and the associated Bases to the Millstone Unit No. 2 Technical Requirements Manual (TRM). The Millstone Unit No. 2 TRM includes information which has been relocated from Technical Specifications or material which has been judged to warrant control. Modifications to the TRM are performed pursuant to the provisions of 10CFR50.59. Due to the nature of the material contained in the TRM and its potential impact on plant licensing, the TRM is maintained in the same manner as a licensing and controlled copy document within the Nuclear Group. The TRM is referenced by the Millstone Unit No. 2 Final Safety Analysis Report (FSAR).

The proposed changes affect Technical Specifications 3/4.9.3.2, "Refueling Operations, Spent Fuel Pool Temperature," 3/4.9.3.3, "Refueling Operations, Decay Time," 3/4.9.5, "Refueling Operations, Communications," 3/4.9.6, "Refueling Operations, Crane Operability - Containment Building," 3/4.9.7, "Refueling Operations, Crane Travel - Spent Fuel Storage Pool Building," and Index Pages IX and XIII. The Bases of the associated Technical Specifications will be moved to the TRM and the Technical Specification Bases Section B 3/4.9 will be modified to address the proposed changes. Each proposed change will be discussed. Additional background information will be included, as necessary, to explain the changes.

These Technical Specifications do not fulfill any one or more of the following 10CFR50.36c(2)(ii) criteria on items for which Technical Specifications must be established. Therefore, these Technical Specifications can be relocated verbatim to the TRM.

- "(ii) A technical specification limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the following criteria:
 - (A) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
 - (B) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

- (C) Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- (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."

Description of Proposed Changes

The proposed changes are described below.

1. Technical Specification 3/4.9.3.2 will be relocated verbatim to the TRM where future changes will be controlled in accordance with 10CFR50.59. The text on the corresponding page will be deleted and replaced with, "This page intentionally left blank."

This specification ensures that the design temperature of the fuel pool cooling system, liner/building structures, and racks is not exceeded. Additionally, this requirement limits spent fuel pool temperature to ensure the resin in the spent fuel cooling demineralizers will not degrade and the temperature and humidity are compatible with personnel comfort and safety requirements.

Criterion 1

This Technical Specification, which limits the spent fuel pool bulk temperature to be less than or equal to 140 °F, does not cover installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the reactor coolant pressure boundary. This specification does not satisfy Criterion 1.

Criterion 2

Spent fuel pool bulk temperature is a design bases process variable which is used to establish the required heat removal capabilities of the spent fuel heat removal system. In the unlikely event of total loss of cooling water flow to the spent fuel pool, the pool water temperature may reach 212 °F within approximately 9 hours and will result in a boiling condition. This event does not represent a challenge to the fuel cladding, as a fission product barrier, unless the fuel becomes uncovered. The requirements on storage pool water level is covered by Technical Specification 3/4.9.12, "Storage Pool Water Level," which requires a minimum of 23 feet of water over the top of irradiated fuel assemblies. Therefore, spent fuel pool bulk temperature is not by itself a process variable that is an initial condition of a design basis accident. This Technical Specification, which limits the spent fuel pool bulk temperature to be less than or

equal to 140 °F, does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 2.

Criterion 3

This Technical Specification, which limits the spent fuel pool bulk temperature to be less than or equal to 140 °F, does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 3.

Criterion 4

The operating restriction on spent fuel pool bulk temperature, which is covered by this Technical Specification has not been shown to be risk significant to public health and safety by either operating experience or probabilistic safety assessment. This Technical Specification does not cover a Structure, System or Component (SSC) requiring risk review/unavailability monitoring as stated in station On-Line Maintenance procedure.⁽¹⁾ This specification does not satisfy Criterion 4.

Conclusion

This Technical Specification does not fulfill any one or more of the 10CFR50.36c(2)(ii) criteria on items for which Technical Specifications must be established. Therefore, this Technical Specification can be relocated verbatim to the TRM.

2. Technical Specification 3/4.3.3 will be relocated verbatim to the TRM where future changes will be controlled in accordance with 10CFR50.59. The text on the corresponding page will be deleted and replaced with, "This page intentionally left blank."

This specification requires the reactor to remain in Mode 5 or 6 until the most recent core offload has decayed a sufficient time to ensure alternate cooling is available during this time to cool the spent fuel pool should a failure occur in the Spent Fuel Pool Cooling System. Alternate cooling would be provided by the Shutdown Cooling System.

⁽¹⁾ Millstone Station, Functional Administrative Procedure, "Conduct of On-Line Maintenance," MP-20-WM-FAP02.1, Rev. 0.

Criterion 1

This Technical Specification, which requires the reactor to remain in Mode 5 or 6 until the most recent core offload has decayed a sufficient time, does not cover installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the reactor coolant pressure boundary. This specification does not satisfy Criterion 1.

Criterion 2

If the requirement to remain in Mode 5 or 6 until the most recent core offload has decayed for 504 hours is not satisfied, the spent fuel pool cooling system may not have the capability to remove decay heat and stay below the Technical Specification limit of 140 °F. In the unlikely event of total loss of cooling water flow to the spent fuel pool, the pool water temperature may reach 212 °F in less than 9 hours and will result in a boiling condition. This event does not represent a challenge to the fuel cladding, as a fission product barrier, unless the fuel becomes uncovered. The requirements on storage pool water level is covered by Technical Specification 3/4.9.12, "Storage Pool Water Level," which requires a minimum of 23 feet of water over the top of irradiated fuel assemblies. Therefore, this requirement to remain in Mode 5 or 6 until the most recent core offload has decayed for 504 hours is not by itself a process variable that is an initial condition of a design basis accident. This Technical Specification, which requires the reactor to remain in Mode 5 or 6 until the most recent core offload has decayed a sufficient time, does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 2.

Criterion 3

This Technical Specification, which requires the reactor to remain in Mode 5 or 6 until the most recent core offload has decayed a sufficient time, does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 3.

Criterion 4

The operating restriction covered by this Technical Specification has not been shown to be risk significant to public health and safety by either operating experience or probabilistic safety assessment. This specification does not satisfy Criterion 4.

Conclusion

This Technical Specification does not fulfill any one or more of the 10CFR50.36c(2)(ii) criteria on items for which Technical Specifications must be established. Therefore, this Technical Specification can be relocated verbatim to the TRM.

3. Technical Specification 3/4.9.5 will be relocated verbatim to the TRM where future changes will be controlled in accordance with 10CFR50.59. The text on the corresponding page will be deleted and replaced with, "This page intentionally left blank."

This specification requires communication between the control room and the refueling station, to ensure any abnormal change in the facility status, as indicated on the control room instrumentation, can be communicated to the refueling station personnel.

Criterion 1

This Technical Specification, which requires communication between the control room and the refueling station, does not cover installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the reactor coolant pressure boundary. This specification does not satisfy Criterion 1.

Criterion 2

This Technical Specification, which requires communication between the control room and the refueling station, does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 2.

Criterion 3

This Technical Specification, which requires communication between the control room and the refueling station, does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 3.

Criterion 4

The operating requirement on communication between the control room and the refueling station, which is covered by this Technical Specification, has not been shown to be risk significant to public health and safety by either operating experience or probabilistic safety assessment. This Technical Specification does not cover a SSC requiring risk review/unavailability monitoring as stated in station On-Line Maintenance procedure. This specification does not satisfy Criterion 4.

Conclusion

This Technical Specification does not fulfill any one or more of the 10CFR50.36c(2)(ii) criteria on items for which Technical Specifications must be established. Therefore, this Technical Specification can be relocated verbatim to the TRM.

4. Technical Specification 3/4.9.6 will be relocated verbatim to the TRM where future changes will be controlled in accordance with 10CFR50.59. The text on the corresponding page will be deleted and replaced with, "This page intentionally left blank."

This specification ensures the lifting device on the refueling machine has adequate capacity to lift the weight of a fuel assembly and a control element assembly, and that an automatic load limiting device is available to prevent damage to the fuel assembly during fuel movement. This automatic load limiting device is not assumed to function to mitigate the consequences of a design basis accident and is checked on a periodic basis to ensure operability.

Criterion 1

This Technical Specification, which ensures the lifting device on the refueling machine has adequate capacity, does not cover installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the reactor coolant pressure boundary. This specification does not satisfy Criterion 1.

Criterion 2

This Technical Specification, which ensures the lifting device on the refueling machine has adequate capacity, does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 2.

Criterion 3

The automatic load limiting device and/or physical stops are not monitored and controlled during operation, nor are they assumed to function to mitigate the consequences of a design basis accident. This Technical Specification, which ensures the lifting device on the refueling machine has adequate capacity, does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 3.

Criterion 4

The operating requirement to ensure the lifting device on the refueling machine has adequate capacity, which is covered by this Technical Specification, has not been shown to be risk significant to public health and safety by either operating experience or probabilistic safety assessment. This Technical Specification does not cover a SSC requiring risk review/unavailability monitoring as stated in station On-Line Maintenance procedure. This specification does not satisfy Criterion 4.

Conclusion

This Technical Specification does not fulfill any one or more of the 10CFR50.36c(2)(ii) criteria on items for which Technical Specifications must be established. Therefore, this Technical Specification can be relocated verbatim to the TRM.

5. Technical Specification 3/4.9.7 will be relocated verbatim to the TRM where future changes will be controlled in accordance with 10CFR50.59. The text on the corresponding page will be deleted and replaced with, "This page intentionally left blank."

This specification ensures loads in excess of one fuel assembly containing a control element assembly, plus the weight of the fuel handling tool, will not be moved over other fuel assemblies in the spent fuel storage racks. Therefore, in the event of a drop of this load, the activity released is limited to that contained in one fuel assembly.

This specification also applies to the prevention of a heavy load (except the consolidated fuel storage box) drop accident and ensures that the damage caused by the load is limited to the equivalent of one fuel assembly.

Criterion 1

This Technical Specification, which ensures loads in excess of 1800 pounds (except of a consolidated fuel storage box) are prohibited from travel over irradiated fuel, does not cover installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the reactor coolant pressure boundary. This specification does not satisfy Criterion 1.

Criterion 2

This specification ensures that loads in excess of one fuel assembly containing a control rod, plus the weight of the fuel handling tool, will not be moved over other fuel assemblies stored in the spent fuel storage racks. Therefore, in the event of a drop of this load, the activity released is limited to that contained in one fuel assembly. This also prevents any possible distortion of fuel assemblies in the storage racks from achieving a critical configuration. This specification applies to prevention of a heavy load drop event and assures that the damage caused by the load is limited to the equivalent of one spent fuel assembly. This assumption is consistent with the activity release assumed in the design bases accident (DBA) analyses for a fuel handling accident; however, the load drop event is not a DBA and is not discussed in MP2 FSAR accident analysis section. This technical specification ensures that the radiological consequences of a heavy load drop event in the spent fuel pool (SFP), which is not a DBA, are covered by the radiological consequences of a fuel handling accident in the SFP. The radiological consequences of the fuel handling accident in the SFP is covered in section 14.7.4 of the FSAR. This technical specification does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Therefore, Technical Specification 3/4.9.7 does not satisfy Criterion 2 of 10CFR50.36c(2)(ii), and can be relocated to the Technical Requirements Manual.

It should be noted that this is consistent with NRC guidance provided in the NRC staff review of Nuclear Steam Supply System owner's groups' application of the commission's interim policy statement criteria to standard Technical Specifications.⁽²⁾

⁽²⁾ T. E. Murley of the Nuclear Regulatory Commission to W. S. Wilgus, B&W Owners Group, "NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications," dated May 9, 1988.

Criterion 3

This Technical Specification, which ensures loads in excess of 1800 pounds (except of a consolidated fuel storage box) are prohibited from travel over irradiated fuel, does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This specification does not satisfy Criterion 3.

Criterion 4

The operating requirement to ensure that loads in excess of 1800 pounds (except of a consolidated fuel storage box) are prohibited from travel over irradiated fuel, which is covered by this Technical Specification, has not been shown to be risk significant to public health and safety by either operating experience or probabilistic safety assessment. This Technical Specification does not cover a SSC requiring risk review/unavailability monitoring as stated in station On-Line Maintenance procedure. This specification does not satisfy Criterion 4.

Conclusion

This Technical Specification does not fulfill any one or more of the 10CFR50.36c(2)(ii) criteria on items for which Technical Specifications must be established. Therefore, this Technical Specification can be relocated verbatim to the TRM.

6. Index pages IX and XIII will be revised by eliminating the sections corresponding to Technical Specifications 3/4.9.3.2, 3/4.9.3.3, 3/4.9.5, 3/4.9.6, and 3/4.9.7. These sections will be relocated to the TRM.
7. The proposed change to Bases sections 3/4.9.3, 3/4.9.5, 3/4.9.6 and 3/4.9.7 will delete the text associated with each section and replace the section title with the word, "DELETED." These sections will be relocated to the TRM.

Safety Summary

The proposed changes will relocate Technical Specifications 3/4.9.3.2, 3/4.9.3.3, 3/4.9.5, 3/4.9.6, 3/4.9.7 and the associated Bases to the Millstone Unit No. 2 TRM, and revise Index pages IX and XIII. The Bases of the associated Technical Specifications will be moved to the TRM and the Technical Specification Bases Section B 3/4.9 will be modified to address the proposed changes.

Technical Specification 3/4.9.3.2, "Refueling Operations, Spent Fuel Pool Temperature," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification limits spent fuel pool temperature to be less than or equal 140 °F to ensure the resin in the spent fuel cooling demineralizers will not degrade and the temperature and humidity are compatible with personnel comfort and safety requirements. Additionally, the requirement ensures that the design temperature of the fuel pool cooling system, liner/building structures, and racks is not exceeded. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in limiting the spent fuel pool bulk temperature to be less than or equal to 140 °F. The proposed change will not alter the way pool temperature is measured, it will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. Therefore, the proposed change will have no adverse effect on plant safety.

Technical Specification 3/4.9.3.3, "Refueling Operations, Decay Time," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification requires the reactor to remain in Mode 5 or 6 until the most recent core offload has decayed a sufficient time to ensure alternate cooling is available during this time to cool the spent fuel pool should a failure occur in the Spent Fuel Pool Cooling System. Alternate cooling would be provided by the Shutdown Cooling System. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring that the most recent core offload has decayed a sufficient time. The proposed change will not alter the requirement that the most recent core offload has decayed a sufficient time, it will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. Therefore, the proposed change will have no adverse effect on plant safety.

Technical Specification 3/4.9.5, "Refueling Operations, Communications," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification requires communication between the control room and the refueling station, to ensure any abnormal change in the facility status, as indicated on the control room instrumentation, can be communicated to the refueling station personnel. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring communication between the control room and the refueling station. The proposed change will not alter the requirement on communication between the control room and the refueling station, it will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. Therefore, the proposed change will have no adverse effect on plant safety.

Technical Specification 3/4.9.6, "Refueling Operations, Crane Operability - Containment Building," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification ensures the lifting

device on the refueling machine has adequate capacity to lift the weight of a fuel assembly and a control element assembly, and that an automatic load limiting device is available to prevent damage to the fuel assembly during fuel movement. These interlocks are not assumed to function to mitigate the consequences of a design basis accident. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring that the lifting device on the refueling machine has adequate capacity. The proposed change will not alter the requirement that the lifting device on the refueling machine has adequate capacity, it will not alter any of the assumptions used in the accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. Therefore, the proposed change will have no adverse effect on plant safety.

Technical Specification 3/4.9.7, "Refueling Operations, Crane Travel - Spent Fuel Storage Pool Building," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification ensures loads in excess of one fuel assembly containing a control element assembly, plus the weight of the fuel handling tool, will not be moved over other fuel assemblies in the spent fuel storage racks. Therefore, in the event of a drop of this load, the activity released is limited to that contained in one fuel assembly. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring that loads in excess of 1800 pounds (except of a consolidated fuel storage box) are prohibited from travel over irradiated fuel. The proposed change will not alter the requirement that the crane interlocks and or physical stops are OPERABLE, it will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. Therefore, the proposed change will have no adverse effect on plant safety.

Revision of Index Pages IX and XIII and the proposed change to Bases sections by eliminating the sections corresponding to the relocated Technical Specifications are administrative changes. These changes will not alter any of the assumptions used in the fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. Therefore, the proposed change will have no adverse effect on plant safety.

Docket No. 50-336

B17772

Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications
Relocation of Selected Technical Specifications Related to Refueling Operations to the
Technical Requirements Manual
Significant Hazards Consideration

July 1999

**Proposed Revision to Technical Specifications
Relocation of Selected Technical Specifications Related to Refueling Operations
to the Technical Requirements Manual
Significant Hazards Consideration**

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the proposed changes and has concluded that they do not involve a Significant Hazards Consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

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

Technical Specification 3/4.9.3.2, "Refueling Operations, Spent Fuel Pool Temperature," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification limits spent fuel pool temperature to be less than or equal 140 °F to ensure the resin in the spent fuel cooling demineralizers will not degrade and the temperature and humidity are compatible with personnel comfort and safety requirements. Additionally, the requirement ensures that the design temperature of the fuel pool cooling system, liner/building structures, and racks is not exceeded. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in limiting the spent fuel pool bulk temperature to be less than or equal to 140 °F. Spent fuel pool bulk temperature is a design bases process variable which is used to establish the required heat removal capabilities of the spent fuel heat removal system. In the unlikely event of total loss of cooling water flow to the spent fuel pool, the pool water temperature may reach 212 °F within approximately 9 hours and will result in a boiling condition. This event does not represent a challenge to the fuel cladding, as a fission product barrier, unless the fuel becomes uncovered. The requirements on storage pool water level is covered by Technical Specification 3/4.9.12, "Storage Pool Water Level," which requires a minimum of 23 feet of water over the top of irradiated fuel assemblies. Therefore, spent fuel pool bulk temperature is not by itself a process variable that is an initial condition of a design basis accident. This Technical Specification does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. It does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The proposed change will not alter the way pool temperature is measured, nor will it alter any

of the assumptions used in the spent fuel pool fuel handling accident analysis. Relocation of this Technical Specification to the TRM does not degrade the performance of any safety systems or prevent actions assumed in the accident analysis, nor does it alter any of the assumptions made in the analysis that could increase the consequences of accidents. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

Technical Specification 3/4.9.3.3, "Refueling Operations, Decay Time," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification requires the reactor to remain in Mode 5 or 6 until the most recent core offload has decayed a sufficient time to ensure alternate cooling is available during this time to cool the spent fuel pool should a failure occur in the Spent Fuel Pool Cooling System. Alternate cooling would be provided by the Shutdown Cooling System. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring that the most recent core offload has decayed a sufficient time. If the requirement to remain in Mode 5 or 6 until the most recent core offload has decayed for 504 hours is not satisfied, the spent fuel pool cooling system may not have the capability to remove decay heat and stay below the Technical Specification limit of 140 °F. In the unlikely event of total loss of cooling water flow to the spent fuel pool, the pool water temperature may reach 212 °F in less than 9 hours and will result in a boiling condition. This event does not represent a challenge to the fuel cladding, as a fission product barrier, unless the fuel becomes uncovered. The requirements on storage pool water level is covered by Technical Specification 3/4.9.12, "Storage Pool Water Level," which requires a minimum of 23 feet of water over the top of irradiated fuel assemblies. Therefore, this requirement to remain in Mode 5 or 6 until the most recent core offload has decayed for 504 hours is not by itself a process variable that is an initial condition of a design basis accident. This Technical Specification does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. It does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The proposed change will not alter the requirement that the most recent core offload has decayed a sufficient time, nor will it alter any of the assumptions used in the spent fuel pool fuel handling accident analysis. Relocation of this Technical Specification to the TRM does not degrade the performance of any safety systems or prevent actions assumed in the accident analysis, nor does it alter any of the assumptions made in the analysis that could increase the consequences of accidents. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

Technical Specification 3/4.9.5, "Refueling Operations, Communications," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification requires communication between the control room and the refueling station, to ensure any abnormal change in the facility status, as indicated on the control room instrumentation, can be communicated to the refueling station personnel. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring communication between the control room and the refueling station. This Technical Specification does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. It does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The proposed change will not alter the requirement on communication between the control room and the refueling station, nor will it alter any of the assumptions used in the spent fuel pool fuel handling accident analysis. Relocation of this Technical Specification to the TRM does not degrade the performance of any safety systems or prevent actions assumed in the accident analysis, nor does it alter any of the assumptions made in the analysis that could increase the consequences of accidents. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

Technical Specification 3/4.9.6, "Refueling Operations, Crane Operability - Containment Building," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification ensures the lifting device on the refueling machine has adequate capacity to lift the weight of a fuel assembly and a control element assembly, and that an automatic load limiting device is available to prevent damage to the fuel assembly during fuel movement. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring that the lifting device on the refueling machine has adequate capacity. The automatic load limiting device and/or physical stops are not monitored and controlled during operation, nor are they assumed to function to mitigate the consequences of a design basis accident. The automatic load limiting device is checked on a periodic basis to ensure operability. This Technical Specification, which ensures the lifting device on the refueling machine has adequate capacity, does not cover a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The proposed change will not alter the requirement that the lifting device on the refueling machine has adequate capacity, nor will it alter any of the assumptions

used in the accident analysis. Relocation of this Technical Specification to the TRM does not degrade the performance of any safety systems or prevent actions assumed in the accident analysis, nor does it alter any of the assumptions made in the analysis that could increase the consequences of accidents. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

Technical Specification 3/4.9.7, "Refueling Operations, Crane Travel - Spent Fuel Storage Pool Building," is proposed to be relocated to the TRM where future changes will be controlled in accordance with 10CFR50.59. This specification ensures loads in excess of one fuel assembly containing a control element assembly, plus the weight of the fuel handling tool, will not be moved over other fuel assemblies in the spent fuel storage racks. Therefore, in the event of a drop of this load, the activity released is limited to that contained in one fuel assembly. Relocation of this Technical Specification to the TRM does not imply any reduction in its importance in insuring that loads in excess of 1800 pounds (except of a consolidated fuel storage box) are prohibited from travel over irradiated fuel. While this Technical Specification does address an operating restriction assumed in the accident analysis, there is no process variable that can be monitored during power operation of the plant. Crane interlocks and/or physical stops are used to assure that this requirement is met, but indication of the operation of the interlocks and/or physical stops is not available in the control room. These features inhibit movement of the crane so that monitoring is not necessary. This Technical Specification does not cover a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The proposed change will not alter the requirement that the crane interlocks and/or physical stops are OPERABLE, nor will it alter any of the assumptions used in the spent fuel pool fuel handling accident analysis. Relocation of this Technical Specification to the TRM does not degrade the performance of any safety systems or prevent actions assumed in the accident analysis, nor does it alter any of the assumptions made in the analysis that could increase the consequences of accidents. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

Revision of Index Pages IX and XIII and the proposed change to Bases sections, by relocating them to the TRM, are administrative changes. Therefore, this change will not significantly increase the probability or consequences of an accident previously evaluated.

The proposed changes do not alter how any structure, system, or component functions. There will be no effect on equipment important to safety. The proposed changes have no effect on any of the design basis accidents

previously evaluated. Therefore, this License Amendment Request does not impact the probability of an accident previously evaluated, nor does it involve a significant increase in the consequences of an accident previously evaluated.

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

The proposed changes do not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. They do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated. The proposed changes do not introduce any new failure modes. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed relocation of Technical Specification 3/4.9.3.2, "Refueling Operations, Spent Fuel Pool Temperature," to the TRM does not imply any reduction in its importance in limiting the spent fuel pool bulk temperature to less than or equal to 140 °F. The proposed change will not alter the way pool temperature is measured. It will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. The proposed relocation of Technical Specification 3/4.9.3.3, "Refueling Operations, Decay Time," to the TRM does not imply any reduction in its importance in insuring that the most recent core offload has decayed a sufficient time. The proposed change will not alter the requirement that the most recent core offload has decayed a sufficient time, it will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. The relocation of Technical Specification 3/4.9.5, "Refueling Operations, Communications," to the TRM does not imply any reduction in its importance in insuring communication between the control room and the refueling station. The proposed change will not alter the requirement on communication between the control room and the refueling station, it will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. The relocation of Technical Specification 3/4.9.6, "Refueling Operations, Crane Operability - Containment Building," to the TRM does not imply any reduction in its importance in insuring that the lifting device on the refueling machine has adequate capacity. The proposed change will not alter the requirement that the lifting device on the refueling machine has adequate capacity, it will not alter any of the assumptions used in the accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. The relocation of Technical Specification 3/4.9.7, "Refueling Operations, Crane

Travel - Spent Fuel Storage Pool Building," to the TRM does not imply any reduction in its importance in insuring that loads in excess of 1800 pounds (except of a consolidated fuel storage box) are prohibited from travel over irradiated fuel. The proposed change will not alter the requirement that the crane interlocks and/or physical stops are OPERABLE, it will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit. Revision of Index Pages IX and XIII and the proposed change to Bases sections by eliminating the sections corresponding to the relocated Technical Specifications are administrative changes. These changes will not alter any of the assumptions used in the spent fuel pool fuel handling accident analysis, nor will it cause any safety system parameters to exceed their acceptance limit.

The proposed changes do not affect any of the assumptions used in the accident analysis, nor do they affect any operability requirements for equipment important to plant safety. Therefore, the proposed changes will not result in a significant reduction in the margin of safety as defined in the Bases for Technical Specifications covered in this License Amendment Request.

The NRC has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (June 6, 1986, 51 FR 7751) of amendments that are considered not likely to involve an SHC. Although the changes proposed herein to relocate selected Technical Specifications related to refueling operations to the Millstone Unit No. 2 TRM are not covered by any specific example, NNECO has concluded that the proposed changes do not involve an SHC. This is because this License Amendment Request does not involve a significant increase in the probability of an accident previously evaluated, does not involve a significant increase in the consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, and does not result in a significant reduction in a margin of safety.