

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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June 25, 1987

Docket No. 50-336

B12552

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
Hydraulic and Mechanical Snubbers

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License DPR-65 by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 2.

During the fall 1986 refueling outage at Millstone Unit No. 2, a number of mechanical and hydraulic snubbers were removed from safety related systems. Technical Specification 3.7.8 permits additions and deletions to Tables 3.7-1a and 3.7-1b, Hydraulic and Mechanical Snubbers, respectively, provided that safety evaluations, documentation, and reporting are performed in accordance with 10CFR50.59 and that a proposed revision to the tables is included with the "next license amendment request." The "next license amendment request" was submitted to the NRC Staff by NNECO on February 6, 1987. This amendment request corrected a discrepancy between the Millstone Unit No. 2 Technical Specifications and the Safety Analysis and was submitted on an expedited basis as committed in Licensee Event Report 86-10. The license amendment request contained herein was not processed in time to be included with the above described package. NNECO recognizes that this situation is a violation of the Technical Specifications,⁽¹⁾ and the issuance of this license amendment request will prevent reoccurrence.

In addition, the NRC Staff's Generic Letter 84-13⁽²⁾ endorsed the concept of modifying the snubber related Technical Specifications to remove the specific

(1) This violation was evaluated pursuant to 10CFR50.72 and 10CFR50.73 and was determined to be not reportable. Nonetheless, the Millstone Unit No. 2 Project Manager was verbally notified of this situation.

(2) D. G. Eisenhower letter to All Power Reactor Licensees, "Technical Specification for Snubbers (Generic Letter 84-13)," dated May 3, 1984.

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snubber listings, as long as snubbers were still required to be operable. Accordingly, NNECO hereby proposes to delete Tables 3.7-1a and 3.7-1b and make other minor changes to Section 3.7.8 to support the removal of the specific snubber listings.

Specifically, the proposed changes and the intent of these changes are briefly summarized below:

- o Tables 3.7-1a and 3.7-1b listing the safety-related hydraulic and mechanical snubbers are being deleted from the Technical Specifications. This results in the removal of pages 3/4 7-23 through 3/4 7-30. Snubber listings will be maintained in the station procedures and updated as appropriate, and will be subject to the surveillance requirements as outlined in the Technical Specifications.
- o Minor word changes to Surveillance Requirement 4.7.8 reflect the removal of Tables 3.7-1a and 3.7-1b.
- o A provision has been added to the Action statement for the Limiting Condition for Operation that allows an engineering evaluation to be performed to demonstrate system or component operability with an inoperable snubber.
- o The bases for this section have been modified to reflect the removal of the snubber tables and the addition of the provision for an engineering evaluation.

NNECO has reviewed the attached proposed changes pursuant to 10CFR50.59 and has determined that they do not constitute an unreviewed safety question. The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety (i.e., safety-related) previously evaluated in the Final Safety Analysis Report have not been increased. The possibility for an accident or malfunction of a different type than any evaluated previously in the Final Safety Analysis Report has not been created. There has not been a reduction in the margin of safety as defined in the basis for any Technical Specification. These proposed changes will not result in physical changes to the plant or changes in the way the plant is operated. All snubbers necessary to maintain the operability of plant systems are required to be operable as in the existing technical specifications. Hence, there is no effect on the design basis accident analyses.

NNECO has also reviewed the proposed changes in accordance with 10CFR50.92 and has concluded that they do not involve a significant hazards consideration in that these changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously analyzed. There are no physical changes to the plant as a result of the proposed changes and the requirements of the Technical Specifications for snubber operability have not changed in intent. Therefore, previously analyzed accidents are not affected.

2. Create the possibility of a new or different kind of accident from any previously analyzed. Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created because no new failure modes are introduced.
3. Involve a significant reduction in a margin of safety. The proposed changes to the Technical Specifications do not reduce the surveillance testing requirements. Therefore, the margins of safety are not affected.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986). The proposed changes described herein most closely resemble example (vi), a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. The changes have no effect on the intent of the original Technical Specifications. No changes in the intent of current surveillance testing will result. The changes will more easily accommodate future additions or deletions to the safety-related snubber listings because a formal license amendment will not be required. However, any changes in snubber quantities, types, or locations would be a change to the facility, and such changes would continue to be evaluated against the provisions of 10CFR50.59, and would be reflected in plant records as appropriate.

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

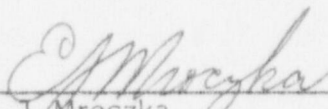
To accommodate any possible changes to the snubber population at Millstone Unit No. 2 during the January 1988 refueling outage, NNECO requests that this amendment be issued by December 1, 1987.

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 application fee of \$150.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President

U. S. Nuclear Regulatory Commission
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Enclosure

cc: W. T. Russell, Region I Administrator
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 2
T. Rebelowski, Resident Inspector, Millstone Unit No. 1 & 2

Mr. Kevin McCarthy
Director, Radiation Control Unit
Department of Environmental Protection
Hartford, Connecticut 06116

STATE OF CONNECTICUT)
COUNTY OF HARTFORD) ss. Berlin

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Lerraine J. D'Amico
Notary Public

My Commission Expires March 31, 1988