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Utilities System

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July 26, 1994

Docket No. 50-336
B14909

Re: 10CFR50.90
10CFR50.91

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

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
One-Time Extension to 18-Month Snubber Surveillance

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License DPR-65 by incorporating the attached change into the Technical Specifications of Millstone Unit No. 2. Also, NNECO is requesting that the NRC Staff process this license amendment request on an exigent basis in accordance with 10CFR50.91(a)(6) in that failure to act expeditiously on this proposed license amendment would result in a reactor shutdown. The proposed change to the Millstone Unit No. 2 Technical Specification, Section 4.7.8.d, will extend the surveillance requirement frequency for the snubber functional tests by allowing a one-time extension to the current 18-month surveillance, plus the additional 25 percent allowed by Technical Specification 4.0.2. The functional tests of snubbers are currently required to be performed no later than August 21, 1994. The proposed change will defer the functional tests until the 1994 (Cycle 12) refueling outage, but not beyond October 31, 1994.

The proposed change is discussed in detail below. Attachment 2 provides a markup of the proposed change, and Attachment 3 provides the retyped pages of the Millstone Unit No. 2 Technical Specifications.

Background

NNECO has determined that surveillance requirement 4.7.8.d, "Snubber Tests," is required to be performed no later than August 21, 1994. The proposed change will defer this surveillance until the 1994 refueling outage, but no later than October 31, 1994. NNECO has concluded that this is acceptable from a safety standpoint, as detailed further in this letter. At Millstone Unit No. 2, snubbers are inspected, tested, and maintained to provide

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very reliable dynamic supports. Typically, the snubbers are inspected and tested on a refueling frequency. Snubber functional tests are used to ensure (with a 95 percent confidence factor) that 90 percent to 100 percent of the snubbers are operable. The tests are performed on a 10 percent random sample of the safety-related snubbers. Also, during refueling outages, various snubbers are replaced with fully-tested units based on service life and manufacturers' recommendations. Snubber visual inspections, functional tests, and replacement activities are mandated by Technical Specifications and Section XI of the ASME Boiler and Pressure Vessel Code.

At Millstone Unit No. 2, per Technical Specification Section 4.7.8.d, at least once per 18 months during plant shutdown, a representative sample of 10 percent of each type of safety-related snubber is functionally tested. For each snubber that fails, an additional 5 percent of the total installed population of that type of snubber is functionally tested.

Based on the above, the next surveillance interval for snubbers began on October 6, 1992. They were scheduled to be tested next during a refueling outage originally planned to commence on July 30, 1994. However, as a result of an unusually long maintenance outage (reactor coolant pump seal replacement extended by diesel generator repairs and control room ventilation modifications) during 1994, NNECO has rescheduled the Millstone Unit No. 2 refueling outage to begin in September 1994. Increasing the interval between refueling outages will cause Millstone Unit No. 2 to exceed the 18-month surveillance interval, plus the additional 25 percent allowance allowed by Technical Specification 4.0.2. Specifically, the next functional test for snubbers is currently required to be performed no later than August 21, 1994. The proposed change, if approved, will allow NNECO to perform the required functional tests for snubbers during the next refueling outage.

Description of the Proposed Change

The proposed change to the Millstone Unit No. 2 Technical Specification 4.7.8.d will extend the surveillance requirement frequency for functional tests of snubbers by allowing a one-time extension to the current 18-month surveillance interval plus the additional 25 percent allowed by Technical Specification 4.0.2. Specifically, the proposed change will defer the functional tests until the 1994 (Cycle 12) refueling outage, but not beyond October 31, 1994. The existing 18-month surveillance plus the additional 25 percent allowed by Technical Specification 4.0.2 would require functional testing of snubbers to be completed by August 21, 1994, necessitating an unscheduled plant shutdown. Technical Specification changes related to the snubber functional

testing interval (extending the 18-month interval) have been accepted by the NRC on Millstone Unit No. 3.⁽¹⁾ The changes proposed herein are similar in nature to those previously found acceptable by the NRC for Millstone Unit No. 3.

Safety Assessment

NNECO has reviewed the proposed change to assess the impact on the accidents previously evaluated, the potential for creation of a new unanalyzed event, and the impact on the margin of safety. It is our judgment that the increased functional test interval, from the maximum existing interval of 22.5 months (18 months plus 25 percent) to the proposed interval of approximately 25 months, will have a negligible effect on the overall reliability of the snubber population. This judgment is based, in part, on the results of functional testing performed during Millstone Unit No. 2's last refueling outage. During that testing, a total of three functional test failures were identified. Subsequent inspections of the snubbers, followed by analysis of the failures, identified no specific failure trend and concluded that the failures were random failures in the snubber population. This determination, combined with the historically favorable performance of Millstone Unit No. 2 snubbers, yields an overall level of confidence in the reliability of the snubber population that exceeds the minimum levels required by the Technical Specifications. As such, we conclude that an extension of approximately two months in the functional test interval does not compromise the attainment of a 95 percent confidence level that 90 to 100 percent of all snubbers will remain operable.

An additional consideration, with respect to the reliability of the snubber population between functional testing phases, involves provisions set forth by ASME O&M-4 (1990), entitled "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)." Section 7.4 of this standard sets the in-service operability testing of snubbers at refueling outages, rather than at an 18-month interval. Although the provisions in ASME O&M-4 are, in some cases, more extensive than those of Millstone Unit No. 2's Technical Specifications, their intent is to provide a similar level of confidence in the reliability of the snubber population. This being the case, it is an indication that minor deviations to the test inspection interval are not significant contributors to confidence and reliability levels. In other words, test intervals of 18 months (+25 percent) or 24 months (+25 percent), the latter representing the refueling cycle for an increasing number of operating nuclear plants, provide comparable and acceptable levels

(1) V. L. Rooney letter to J. F. Opeka, "Issuance of Amendment (TAC No. M85470)," dated March 9, 1993.

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of confidence in the reliability of snubber populations. The shutdown of Millstone Unit No. 2 in August 1994 to perform functional inspections would result in a significant accumulation of radiation exposure, as well as posing an industrial safety risk in performing these additional maintenance activities. The small safety benefit which would be realized by performing testing, as per the existing Technical Specification schedule, would be more than offset by the increased radiation exposure and industrial safety risks. It is our determination that the proposed change in the functional test interval still results in an adequate level of confidence in the reliability of the snubber population and is, therefore, safe and acceptable.

Justification for Exigent License Amendment

Pursuant to 10CFR50.91(a)(6), NNECO hereby requests NRC Staff exigent approval of the proposed amendment to its Operating License, DPR-65. Exigent approval is appropriate because, in order to preclude an unnecessary shutdown, "the licensee and the Commission must act quickly and that time does not permit ... 30 days for prior public comment." At present, Millstone Unit No. 2 is at full power and exigent approval is required by Sunday, August 21, 1994, to avoid a shutdown of Millstone Unit No. 2. From a nuclear safety perspective, a plant shutdown is not the appropriate course of action.

We are aware of no other 18-month surveillances that require that the plant be shutdown that will expire before the currently scheduled start of the 1994 refueling outage. This is due, in part, to NNECO having performed the remainder of those surveillances that would require shutdown conditions during the aforementioned maintenance outage. However, because the maintenance outage was incrementally extended several times from an initial schedule of 18 days to approximately 56 days, there was an insufficient contiguous block of time in which to plan and execute the resource intensive and lengthy snubber surveillance process. Following identification of this problem, NNECO informed the Staff of the status and planned course of action for resolution of this issue. Two options available to resolve this issue were to either plan a shutdown of the plant on August 21, 1994, and perform the surveillance, or seek an extension for the subject Technical Specification surveillance. Discussion with the Staff culminated in an understanding that the Technical Specification should be modified to extend the surveillance requirement for functional tests of snubbers.

Further, the requested exigent approval is appropriate because this amendment request does not involve a significant hazards consideration (SHC). Based on the SHC discussion provided later, we have determined that the increase in the functional test

interval will not result in a substantive decrease in the reliability of the snubber population. Also, we are confident in maintaining a 95 percent confidence level that 90 to 100 percent of the snubber population will remain operable. Importantly, this is the underlying objective of the surveillance requirement. In addition, any benefits that would be gained by testing during the present interval would be more than offset by the increased radiation exposure and industrial safety risks. Therefore, we have concluded that this license amendment request is acceptable and thoroughly justified from a safety standpoint.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed change and has concluded that the change does not involve an SHC. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed change does not involve an SHC because the change would not:

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

It is our judgement that the increased functional test interval, from the maximum allowable interval of 22.5 months (18 months plus 25 percent) to the proposed interval of approximately 25 months, will have a negligible effect upon the overall reliability of the snubber population. This judgement is based on the results of functional testing performed during Millstone Unit No. 2's last refueling outage (RFO 11). This testing did not reveal any anomalies or increase in the failure rate of snubbers at Millstone Unit No. 2 from historical functional testing conducted during previous outages.

During the RFO 11 testing, 14 hydraulic and 13 mechanical snubbers were tested to meet the technical specification test requirements. A summary of this testing is detailed in Attachment 1 of this letter. Due to the failure of one snubber in each of the two categories, an additional seven snubbers in each category were tested to meet the five percent sample expansion requirement. The sample expansion tests did not result in any additional failures. In addition to the technical specification tests, 20 additional snubbers, 10 mechanical and 10 hydraulic, were also functionally tested for other reasons (e.g., snubbers which had failed during the previous outage surveillance testing, snubbers which were noted with visual discrepancies, etc.). These additional tests resulted in one hydraulic snubber failure. Sample expansion due to this non-technical specification surveillance

functional test is not required per the technical specification.

In summary, 61 snubbers (representing 22 percent of the total plant snubber population) were tested during RFO 11 resulting in three failures (five percent of the tested samples). Since the three failures involved snubbers of different sizes and were not located in the same plant area, no specific failure trend was identified. The three snubber failures are therefore considered to be random failures of the snubber population. These failures are consistent with our experience of the failure rate of the snubbers at Millstone Unit No. 2 from previous outages. RFO 10 functional testing had resulted in three snubber failures from testing 48 snubbers.

In addition, 27 snubbers (14 mechanical and 13 hydraulic) are presently planned for functional testing during RFO 12, bringing the total tested between the two outages to 87 snubbers out of a total of 268 (32 percent) at Millstone Unit No. 2. It is also noted that 45 additional snubbers are expected to be replaced during RFO 12, due to end of service life considerations, bringing the total of tested snubbers between the two outages to 49 percent of the total plant snubber population.

Three snubber conditions have recently been detected, described in Plant Information Reports (PIR), and evaluated during the current operation cycle of Millstone Unit No. 2 (PIR 2-93-338, PIR 2-94-215 and PIR 2-94-261). Detection of these conditions was a direct result of routine plant walkdowns at Millstone Unit No. 2. PIRs 2-93-338 and 2-94-261 were associated with the same pipe support. In December 1993 (PIR 2-93-338), the snubber was noted to be exposed to operational vibrations. Since the effects of the vibrations on the functionality of the snubber could not be determined without testing, the snubber was replaced and functionally tested. The test results were acceptable and indicated that the snubber was operable in its original condition.

In June 1994 (PIR 2-94-261), the snubber at the same support was noted to have a loose spherical bushing and was again replaced and functionally tested. The test results were acceptable indicating that the snubber was operable. A detailed evaluation of this condition is presently on-going. At this time, the cause for the loose bushing is still being investigated. Based on discussions with the snubber vendor, the loose spherical bushing is not the result of in-service conditions associated with operational loads of the design installation.

Finally, PIR 2-94-215 identifies a snubber load pin which was found to be partially out of the clevis. The pipe support, which contained two snubbers, was determined to be still operable. However, as a result of this finding, 45 snubber supports were visually inspected to ensure that an acceptable retaining device is properly installed. No additional deficiencies were found.

Thus, none of the snubbers associated with the three recently evaluated conditions were found to be inoperable.

Based on the above described experiences with snubbers at Millstone Unit No. 2 it is concluded that the testing interval increase of approximately two months will not result in a significant change in the expected performance and reliability of the existing snubbers. Also, essentially the same level of confidence as that associated with the Technical Specification required schedule will be maintained.

In conclusion, increasing the functional test interval for snubbers by approximately two months, will not result in a significant increase in the probability or consequences of an accident previously evaluated.

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

No new equipment is being added to the plant and no change is being made in the way existing equipment is being operated and maintained. Variation in the functional test interval will neither change nor increase the snubber failure or malfunction modes considered in determining the required confidence levels relating to snubber population reliability. Therefore, there is no possibility of creating a new or different kind of accident from any accident previously evaluated.

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

The type of testing performed and the actions taken if a snubber were to fail its functional test remain unchanged. The proposed testing schedule defined in the Technical Specifications provides essentially the same level of confidence as the present schedule. In addition, there is no impact on the consequences of any accident or on any of the protective boundaries, and therefore, no impact on the safety limits. Thus the margin of safety related to snubber surveillance requirements, inherent to the Technical Specifications, will remain virtually unchanged.

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Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51FR7751) of amendments that are considered not likely to involve an SHC. Although the proposed change is not enveloped by a specific example, the proposed change would not involve a significant increase in the probability or consequences of an accident previously analyzed. The increased functional test interval, from the maximum existing interval of 22.5 months (18 months plus 25 percent) to approximately 25 months, will have a negligible effect upon the overall reliability of the snubber population. This conclusion is based, in part, upon the results of the functional testing performed during the last refueling outage in which only three snubber failures, determined to be random failures, occurred. This fact, combined with the historically favorable performance of Millstone Unit No. 2 snubbers, provides reasonable assurance of the overall reliability of the snubber population with a surveillance interval increased to approximately 25 months.

Environmental Consideration

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not increase the types and amounts of effluents that may be released off site, nor significantly increase individual or cumulative occupational radiation exposures. In fact, the proposed change will eliminate an otherwise unnecessary plant shutdown which will result in decreased individual or cumulative occupational radiation exposure. Based on the foregoing, NNECO concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

Conclusion

In summary, NNECO is requesting an exigent license amendment that would allow the 18-month (plus 25 percent) surveillance requirement for Millstone Unit No. 2 snubber functional inspection to be performed during the Cycle 12 refueling outage. Current snubber functional surveillance requirements in Technical Specification 4.7.8.d (due no later than August 21, 1994) would force the unit to shut down for this purpose. Therefore, NNECO hereby requests the NRC Staff to process and issue this proposed amendment prior to August 21, 1994, to be effective upon issuance. We acknowledge and apologize for the short time available to process this request on an exigent basis. We also wish to emphasize our conclusion that this proposed amendment involves no undue safety risk nor irreversible environmental consequences. We are, therefore, requesting this action to allow continued operation of the plant.

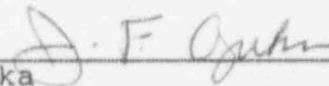
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The Millstone Unit No. 2 Nuclear Review Board has reviewed and concurred with the above determination. In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this amendment via facsimile to ensure their awareness of this request.

We will promptly provide any additional information the NRC Staff may need to respond to this request. The NNECO contact for this proposed revision is Mr. R. S. Peterson at (203) 665-3776.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



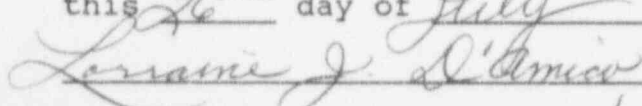
J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos.
1, 2, and 3

Mr. Kevin T.A. McCarthy, Director
Monitoring and Radiation Division
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79 Elm Street
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Subscribed and sworn to before me

this 26th day of July, 1994



Date Commission Expires: 3/31/98

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications
RFO-11 (1992) Snubber Functional Test List

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications
One-Time Extension to 18-Month Snubber Surveillance
Marked-up Pages

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Attachment 3

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications
One-Time Extension to 18 Month Snubber Surveillance
Retyped Pages

July 1994

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications
RFO-11 (1992) Snubber Functional Test List

July 1994

MP2 RFO-11 (1992)
 SNUBBER
 FUNCTIONAL TEST LIST

Support Location	Work Group	As-Found	Snubber Information			Comments
		Test Date	Manufacture/Type	Size	Serial No.	
312016B	Hyd - Group 1	SAT	Grinnell/Hydraulic	4" x 5"	12632	
312016B	Hyd - Group 1	SAT	Grinnell/Hydraulic	4" x 5"	12634	
410065A	Hyd - Group 1	SAT	Grinnell/Hydraulic	2.5" x 5"	11785	
410065B	Hyd - Group 1	FAILED	Grinnell/Hydraulic	2.5" x 5"	11784	
413024B	Hyd - Group 1	SAT	Grinnell/Hydraulic	5" x 5"	12966B	
413032A	Hyd - Group 1	SAT	Grinnell/Hydraulic	6" x 5"	13068	
413032B	Hyd - Group 1	SAT	Grinnell/Hydraulic	8" x 5"	13097	
413082B	Hyd - Group 1	SAT	Grinnell/Hydraulic	1.5" x 5"	11676	
413181	Hyd - Group 1	SAT	Grinnell/Hydraulic	2.5" x 5"	13674	
413182A	Hyd - Group 1	SAT	Grinnell/Hydraulic	3.25" x 5"	12711	
413182B	Hyd - Group 1	SAT	Grinnell/Hydraulic	3.25" x 5"	14320	
427097A	Hyd - Group 1	SAT	Grinnell/Hydraulic	2.5" x 5"	13570	
427097B	Hyd - Group 1	SAT	Grinnell/Hydraulic	2.5" x 5"	13741	
513032	Hyd - Group 1	SAT	Grinnell/Hydraulic	6" x 5"	11679	
312016A	Hyd - Group 2	SAT	Grinnell/Hydraulic	4" x 5"	12633	
402009	Hyd - Group 2	SAT	Grinnell/Hydraulic	1.5" x 5"	11194	
402022	Hyd - Group 2	SAT	Grinnell/Hydraulic	2.5" x 5"	OBLIT1	
402107	Hyd - Group 2	SAT	Grinnell/Hydraulic	2.5" x 5"	12715	
412003	Hyd - Group 2	SAT	Grinnell/Hydraulic	6" x 5"	13032	
413009	Hyd - Group 2	SAT	Grinnell/Hydraulic	2.5" x 5"	11019	
413179	Hyd - Group 2	SAT	Grinnell/Hydraulic	4" x 5"	14325	
408004B	Mech - Group 1	SAT	PSA/Mechanical	PSA-3	12221	
414001A	Mech - Group 1	SAT	PSA/Mechanical	PSA-1	12638	
414001B	Mech - Group 1	SAT	PSA/Mechanical	PSA-1	12627	
410007	Mech - Group 1	SAT	PSA/Mechanical	PSA-1	4211	
410054	Mech - Group 1	FAILED	PSA/Mechanical	PSA-3	4585	
414018B	Mech - Group 1	SAT	PSA/Mechanical	PSA-1/2	2613	
418032A	Mech - Group 1	SAT	PSA/Mechanical	PSA-1	4860	
418032B	Mech - Group 1	SAT	PSA/Mechanical	PSA-1	12839	
450058A	Mech - Group 1	SAT	PSA/Mechanical	PSA-1/2	9056	
491354C (DP-109)	Mech - Group 1	SAT	PSA/Mechanical	PSA-1/4	12687	
491354G (DP-107)	Mech - Group 1	SAT	PSA/Mechanical	PSA-1/4	9208	
527071A	Mech - Group 1	SAT	PSA/Mechanical	PSA-3	13536	
527071B	Mech - Group 1	SAT	PSA/Mechanical	PSA-3	13916	
414024A	Mech - Group 2	SAT	PSA/Mechanical	PSA-3	12264	
414024B	Mech - Group 2	SAT	PSA/Mechanical	PSA-3	12263	
414029C	Mech - Group 2	SAT	PSA/Mechanical	PSA-1	12854	
414029D	Mech - Group 2	SAT	PSA/Mechanical	PSA-1	12892	
416016A	Mech - Group 2	SAT	PSA/Mechanical	PSA-1/4	27766	
416016B	Mech - Group 2	SAT	PSA/Mechanical	PSA-1/4	9567	
527072A	Mech - Group 2	SAT	PSA/Mechanical	PSA-3	3621	

MP2 RFO-11 (1992)
SNUBBER
FUNCTIONAL TEST LIST

Support Location	Work Group	As-Found	Snubber Information			Comments
		Test Date	Manufacture/Type	Size	Serial No.	
70080	Failed 90	SAT	PSA/Mechanical	PSA-1/4	7762	
491356G (DP-023)	Failed 90	SAT	PSA/Mechanical	PSA-1/4	9197	
502024A	Failed 90	SAT	PSA/Mechanical	PSA-3	25509	
502024B	Failed 90	SAT	PSA/Mechanical	PSA-3	25516	
70038 (DP-215)	Misc - Deficiency	SAT	PSA/Mechanical	PSA-1	9816	Outside cold set range
70100	Misc - Deficiency	SAT	PSA/Mechanical	PSA-1/4	12884	Test, not on ISI Eng. list
401024	Misc - Deficiency	SAT	Grinnell/Hydraulic	2.5" x 5"	11430	Cylinder leakage
401106	Misc - Deficiency	SAT	Grinnell/Hydraulic	2.5" x 5"	13576	LCO, locknut loose, HBI bolt loose
410028	Misc - Deficiency	SAT	Grinnell/Hydraulic	6" x 5"	12743	Leakage, oil on floor
413032A	Misc - Deficiency	SAT	Grinnell/Hydraulic	1.5" x 5"	10994	Pipe clamp found bent
416025	Misc - Deficiency	SAT	Grinnell/Hydraulic	2.5" x 5"	13569	Leakage at bleed screw
491375D	Misc - Deficiency	SAT	PSA/Mechanical	PSA-1/4	12882	Tested per NUSCO Eng. request
501022B	Misc - Deficiency	SAT	Grinnell/Hydraulic	1.5" x 5"	11095	Leakage, oil on cylinder
51119R27A	Misc - Deficiency	FAILED	Grinnell/Hydraulic	6" x 5"	11385	Leakage
51119R28A	Misc - Deficiency	SAT	Grinnell/Hydraulic	6" x 5"	11415	Leakage
51119R28B	Misc - Deficiency	SAT	Grinnell/Hydraulic	6" x 5"	11387	Leakage
410054	Misc - Eng. Request	SAT	PSA/Mechanical	PSA-3	12241	Retest, lead blankets on snubber
527071A	Misc - PIR 2-92-080	SAT	PSA/Mechanical	PSA-3	13918	PIR No. 2-92-080
527071B	Misc - PIR 2-92-080	SAT	PSA/Mechanical	PSA-3	13890	PIR No. 2-92-080
402056A	Misc - Service Life	SAT	Grinnell/Hydraulic	1.5" x 5"	12221	
KEY Group 1: Original Tech. Spec. test sample Group 2: Tech. Spec. expansion sample Mech: Mechanical snubber Hyd: Hydraulic snubber Failed 90: Snubber that failed Tech. Spec. testing in RFO-10 (1990) Misc: Addition snubber tested outside Tech. Spec. requirements Deficiency: Snubber that failed Tech. Spec. "Visual" inspection Service Life: Snubber that required seal replacement						

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

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