

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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October 22, 1982

Docket No. 50-336

A02617

A02456

Director of Nuclear Reactor Regulation
Attn: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

- References:
- (1) R. A. Clark letter to W. G. Council, dated April 23, 1982.
 - (2) D. C. Switzer letter to G. Lear dated, January 23, 1978.
 - (3) W. G. Council letter to R. A. Clark dated, February 19, 1982.
 - (4) E. L. Conner letter to W. G. Council dated, July 2, 1982.
 - (5) W. G. Council letter to R. Reid, dated March 22, 1979.
 - (6) W. G. Council letter to R. A. Clark dated, September 2, 1982.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Proposed Revisions to Technical Specifications
Large and Small Break Loss-of-Coolant
Accident Evaluations

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its operating license, DRP-65, for Millstone Unit No. 2 by incorporating the changes identified in Attachment 1 into the Technical Specifications. The proposed changes are summarized briefly as follows:

1. Revise Technical Specification 3.1.3.3, Action b to allow startup and power operation, including mode changes, with an inoperable reed switch position indicator channel per CEA group. This change is proposed in response to Reference (1) and amends our application of Reference (3).

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2. Revise Technical Specification 3.5.1, Limiting Condition for Operation b to expand the allowable volume band for the safety injection tanks (SIT). This will provide for greater operational flexibility through reasonable measurement tolerances without impacting the safety analyses.
3. Revise Technical Specifications 3.6.1.1 and 3.6.1.3 to clarify the applicability of the containment integrity requirements when the containment air lock seal is inoperable. This change incorporates several provisions of the current Standard Technical Specifications into the Millstone Unit No. 2 license.

Concerning the second proposed change described above, the revised SIT level was utilized as input to the Cycle 5 large break LOCA analysis docketed in Reference (3). No other safety analyses are affected by this proposed change.

The proposed changes have been reviewed pursuant to the requirements of 10CFR50.59 and have not been found to constitute an unreviewed safety question.

The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved the above proposed changes and has concurred in the above determinations.

NNECO is also taking this opportunity to provide the NRC Staff revised large break LOCA analysis results in response to the commitment documented in Reference (4) as well as a small break LOCA evaluation. In anticipation of the potential for additional steam generator tube plugging, both efforts have been completed to demonstrate acceptable plant operation with additional plugged steam generator tubes resulting in a reduced primary coolant system flow rate and steam generator heat transfer area.

The large break LOCA analysis assumptions included the following:

Steam Generator tube plugs:	15.3% (1300 tubes in one generator)
Primary Coolant Flow:	350,000 gpm

In addition, the SIT levels proposed herein have been utilized in the analysis.

The results of the large break LOCA analysis, presented in Attachment 2, demonstrated continued compliance with the criteria delineated in 10CFR50.46. Specifically, the peak clad temperature calculated following a double-ended-cold-leg guillotine at the reactor coolant pump discharge is 2055°F and the local and core-wide metal-water reactions were calculated to be 4.5 and 0.3 percent, respectively.

A reevaluation of the docketed small break LOCA analysis and results was performed to determine their applicability to Cycle 6 operation. This evaluation is provided as Attachment 3. NNECO concludes that continued Plant operation is acceptable with an additional 9.2 percent reduction in the steam generator heat transfer area as compared to that assumed in the Reference (5) small break LOCA analysis and a reduced reactor coolant flow rate of 350,000 gpm.

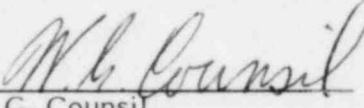
As discussed in Reference (6), a revised small break LOCA model for Millstone Unit No. 2 is scheduled to be submitted to the NRC Staff in March, 1983 by our fuel vendor in fulfillment of Item II.K.3.30 of NUREG-0737. Upon approval of the model, a small break LOCA analysis will be performed and docketed for Staff review. NNECO does not expect the conclusions presented in Attachment 3 to be impacted by the results of the small break reanalysis.

NNECO has reviewed the proposed license amendment pursuant to the requirements of 10CFR170 and has determined that the change constitutes a Class III license amendment.

The basis for this determination is that the proposed changes involve a clearly identified NRC position, a single safety issue and do not involve a significant hazards consideration. As such, enclosed is the appropriate Class III license amendment fee of \$4,000 dollars.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY


W. G. Council
Senior Vice President

STATE OF CONNECTICUT)

) ss. Berlin

COUNTY OF HARTFORD)

October 22, 1982

Then personally appeared before me W. G. Counsil, 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 Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Sheila M. Oates
Notary Public

My Commission Expires March 31, 1986