



Northeast
Utilities System

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September 1, 1994

Docket No. 50-336
B14908

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
Reactor Coolant System Volume

Introduction

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License DPR-65, by incorporating the change identified in Attachments 1 and 2 into the Millstone Unit No. 2 Technical Specifications. NNECO is proposing to modify Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications to reflect a change in the total reactor coolant system (RCS) volume. The total RCS volume has changed slightly due to the installation of new steam generators.

Description of the Proposed Change

NNECO is proposing to modify Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications by changing the total RCS water and steam volume to reflect the installation of new steam generators.

Currently, Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications states: "The total water and steam volume of the reactor coolant system is 10,060 +700/-0 cubic feet." NNECO proposes to replace this statement with the following: "The total water and steam volume of the reactor coolant system is a nominal 10,981 ft³."

Attachments 1 and 2 provide the marked-up and retyped versions of the Millstone Unit No. 2 Technical Specifications, respectively.

Safety Assessment

The steam generators at Millstone Unit No. 2 were replaced during the 1992 refueling outage. This modification resulted in a slight change to the total RCS water and steam volume. The total RCS water and steam volume has been determined to be 10,981 cubic feet,

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based on nominal conditions with the configuration of the new steam generators, zero tube plugging, and control element assemblies withdrawn.

This proposed change simply revises the value presented in Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications for the total RCS water and steam volume to reflect the installation of new steam generators. The steam generator replacements were evaluated as a plant design change request in accordance with the requirements of 10CFR50.59. NNECO determined that the replacement of the steam generators did not involve an unreviewed safety question. The NRC Staff conducted several inspections regarding the steam generator replacement.⁽¹⁾⁽²⁾ In Inspection Report 50-336/92-17, the NRC Staff stated: "The safety evaluation and supporting analysis were detailed and technically sound. The conclusion that this modification did not involve an unreviewed safety question and did not require prior NRC approval was appropriate."

Changing Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications to reflect the new nominal value for the total RCS water and steam volume will not affect public health and safety.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed change and has concluded that it does 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 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.

The proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications revises the total RCS water and steam volume to reflect the installation of new steam generators. Section 5.0 of the Millstone Unit No. 2 Technical Specifications delineates design features for Millstone Unit

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- (1) J. P. Durr letter to J. F. Opeka, "NRC Inspection of Unit 2 Steam Generator Replacement, NRC Region I Inspection Report No. 50-336/92-26," dated December 4, 1992.
 - (2) J. P. Durr letter to J. F. Opeka, "NRC Inspection of Unit 2 Steam Generator Replacement, NRC Region I Inspection Report No. 50-336/92-17," dated August 26, 1992.

No. 2. The proposed change does not modify a limiting condition for operation, action statement, or surveillance requirement. Additionally, the proposed change does not revise the manner in which the plant is operated. It simply revises the value delineated for the total RCS water and steam volume.

The steam generator replacement modifications were addressed in a plant design change request performed in accordance with the requirements of 10CFR50.59. NNECO concluded that the replacement of the steam generators did not involve an unreviewed safety question. This proposed change is a result of those modifications.

Based on the above, the proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications does not involve 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 previously analyzed.

The proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications simply revises the total RCS water and steam volume to reflect the installation of new steam generators. It does not modify the manner in which any plant equipment or systems are operated. Thus, the proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications does not create the possibility of a new or different kind of accident from any previously analyzed.

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

The proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications revises the total RCS water and steam volume to reflect the installation of new steam generators. This proposal simply reflects the slight change in volume due to the replacement of the steam generators. The steam generator replacement modifications were addressed in a plant design change request performed in accordance with the requirements of 10CFR50.59. NNECO concluded that the replacement of the steam generators did not involve an unreviewed safety question.

Based on the above, the proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications does not involve a significant reduction in the margin of safety.

The Commission has provided guidance concerning the application of the standards of 10CFR50.92 by providing certain examples (51 FR 7751, March 6, 1986) of amendments that are not considered likely to involve a SHC. The proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications is not enveloped by a specific example. However, NNECO has concluded that the proposed change does not involve an SHC. The proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications reflects the replacement of the Millstone Unit No. 2 steam generators. This modification was evaluated as part of a plant design change request performed in accordance with the requirements of 10CFR50.59. NNECO concluded that the replacement of the steam generators did not involve an unreviewed safety question.

Environmental Considerations

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 offsite, nor significantly increase individual or cumulative occupational radiation exposures. 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.

Nuclear Review Board

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

Notification of the State of Connecticut

In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this amendment to ensure their awareness of this request.

Schedule for NRC Approval and Issuance

The proposed change to Section 5.4.2 of the Millstone Unit No. 2 Technical Specifications is not required to support continued safe operation of the unit. As such, no specific schedule for approval and issuance is requested. However, we request issuance of the license amendment at your convenience with the amendment effective as of the date of issuance, to be implemented within 30 days of the date of issuance.

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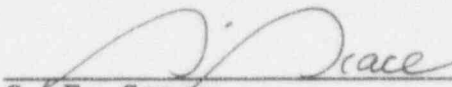
Should you have any questions regarding this submittal, please contact Mr. R. H. Young at (203) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY:

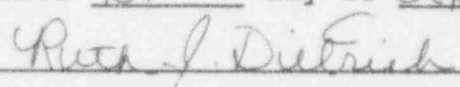

S. E. Scace
Vice President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
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Nos. 1, 2, and 3

Mr. Kevin T. A. McCarthy, Director
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Subscribed and sworn to before me

this 1st day of September, 1994



Date Commission Expires: 3/31/95