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December 21, 1994

Docket No. 50-336
B14946

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 License Condition and
Technical Specifications
Fire Protection

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

Description of Proposed Changes

These changes revise the DPR-65 License Condition 2.C.3 and Technical Specifications Index and Sections 3.3.3.7, 4.3.3.7, 3.7.9, 4.7.9, 3.7.10, 3.7.11, 4.7.10, 6.2.2.f, 6.4.2, 6.5.1.6.j, 6.5.2.6.i, 6.9.2.e and f; and Technical Specification Tables 3.3-10, 3.7-2, and 6.2-1; and Bases 3.3.3.6, 3.3.3.7, 3.3.3.8, 3.7.9, and 3.7.10. Each change is delineated below:

In accordance with Generic Letter 86-10,⁽¹⁾ Technical Specification provisions related to the Fire Protection Program are being relocated from the Technical Specifications to another controlled document, the technical requirements manual (TRM). We note that Generic Letter 86-10 does not provide specific guidance regarding the placement of the fire protection technical specifications into a document such as a TRM. The TRM is a NNECO initiative, which will ensure that the fire protection limiting condition for operations and surveillance requirements are

- (1) D. G. Eisenhower letter to All Power Reactor Licensees and Applicants for Power Reactor Licensees, "Implementation for Fire Protection Requirements (Generic Letter 86-10)," dated April 24, 1986.

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adequately controlled and maintained following relocation from the technical specifications.

The limiting conditions for operation and surveillance requirements for fire protection equipment and the requirements for fire brigade training are being placed in the Millstone Unit No. 2 TRM. Future changes to the TRM will be reviewed to determine if a 10CFR50.59 evaluation is required. Further, changes to Section 6, Administrative Controls, provide that any changes to the Fire Protection Program and implementing procedures are reviewed by either the Plant Operations Review Committee (PORC) or the Site Operations Review Committee (SORC) as are other changes to the Technical Specifications. The relocation of the fire protection requirements into the TRM will allow for rapid updates and dissemination of material.

The following specific changes are being proposed:

License Condition 2.C.3 has been revised to be consistent with Generic Letter 86-10. Condition 2.C.3 relates to the implementation and maintenance of the approved Fire Protection Program and permits changes to the approved Fire Protection Program without prior NRC approval if the changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

Technical Specification related to Fire Detection Instrumentation including Limiting Condition for Operation 3.3.3.7, Surveillance Requirements 4.3.3.7.1, 4.3.3.7.2, and 4.3.3.7.3, and Table 3.3-10 referred to in the Limiting Condition for Operation 3.3.3.7 will be relocated in their entirety. The provisions of these Technical Specifications will be incorporated in the TRM. This relocation will result in pages 3/4 3-43, 3/4 3-44, 3/4 3-45, and 3/4 3-45a remaining but containing only the words, "This page intentionally left blank." The corresponding Bases Section 3/4.3.3.6, Fire Detection Instrumentation will be relocated and so indicated on page B 3/4 3-4. Bases Section 3/4.3.3.7, "Accident Monitoring Instrumentation" will be renumbered to 3/4.3.3.8 to correct a typographical error. Bases 3/4.3.3.7 will be noted as being relocated.

Technical Specification related to Fire Suppression Systems, Fire Suppression Water System including Limiting Condition for Operation 3.7.9.1, Surveillance Requirements 4.7.9.1.1, 4.7.9.1.2, and 4.7.9.1.3 will be relocated in their entirety. The provisions of these Technical Specifications will be incorporated into the TRM. This relocation will result in page 3/4 7-33 remaining and pages 3/4 7-34, 3/4 7-35, and 3/4 7-36 being deleted. The corresponding Bases Section 3/4.7.9, Fire

Suppression Systems, will be relocated and so indicated on page B 3/4 7-6.

Technical Specifications related to Plant Systems, Spray and/or Sprinkler Systems including Limiting Condition for Operation 3.7.9.2 and Surveillance Requirement 4.7.9.2 will be relocated in their entirety. The provisions of these Technical Specifications will be incorporated into the TRM. This relocation will result in the deletion of pages 3/4 7-37 and 3/4 7-38. The corresponding Bases Section 3/4.7.9, Fire Suppression Systems, will be relocated and so indicated on page B 3/4 7-6.

Technical Specifications related to Plant Systems, Fire Hose Stations including Limiting Condition for Operation 3.7.9.3, Surveillance Requirement 4.7.9.3, and Table 3.7-2 referred to in the Limiting Condition for Operation 3.7.9.3 and Surveillance Requirement 4.7.9.3 will be relocated in their entirety. The provisions of the Technical Specifications will be incorporated into the TRM. This relocation will result in the deletion of pages 3/4 7-39 and 3/4 7-40. The corresponding Bases Section 3/4 7.9, Fire Suppression Systems, will be relocated and so indicated on page B 3/4 7-6.

Technical Specifications related to Plant Systems, Halon Fire Suppression System including Limiting Condition for Operation 3.7.9.4 and Surveillance Requirement 4.7.9.4 will be relocated in their entirety. The provisions of the Technical Specifications will be incorporated into the TRM. This relocation will result in the deletion of page 3/4 7-41. The corresponding Bases Section 3/4.7.9, Fire Suppression Systems, will be relocated and so indicated on page B 3/4 7-6.

Technical Specifications related to Plant Systems, Penetration Fire Barriers including Limiting Condition for Operation 3.7.10 and Surveillance Requirement 4.7.10 will be relocated in their entirety. The provisions of the Technical Specifications will be incorporated into the TRM. This relocation will result in the deletion of pages 3/4 7-42 and 3/4 7-43. The corresponding Bases Section 3/4 7-10, Penetration Fire Barriers, will be relocated and so indicated on page B 3/4 7-7.

Technical Specifications related to Plant Systems, Ultimate Heat Sink, will be re-paginated due to the relocation to the TRM of the Fire Protection Technical Specifications.

Technical Specification 6.2.2.f, relating to the site Fire Brigade, will be relocated into the TRM. The existing Technical Specification 6.2.2.g will be renumbered as 6.2.2.f.

Technical Specification Table 6.2-1 will be modified to remove minimum shift crew requirement for the Fire Brigade. This will be relocated into the TRM.

Technical Specification 6.4.2, related to a training program for the Fire Brigade, will be relocated in its entirety. The provisions of this Technical Specification will be incorporated into the TRM.

Two additions will be made to Technical Specification Section 6.0: Technical Specification 6.5.1.6.j will be added to include the review of the Fire Protection Program and implementing procedures as an additional responsibility of the PORC, and Technical Specification 6.5.2.6.i will be added to include the responsibility for review of the common site Fire Protection Program and implementing procedures by the SORC.

Two additional deletions will be made to Technical Specification Section 6.0: Technical Specifications 6.9.2.e and 6.9.2.f, will be deleted. This section required the submission of special reports if a system was inoperable for a period of time. These reports are no longer required by the standard technical specifications.

Safety Assessment

The requirements of the relocated Technical Specifications will be placed in the TRM. Future changes to a fire protection requirement in the TRM will require a 10CFR50.59 evaluation to be performed. The Millstone Unit No. 2 updated Final Safety Analysis Report currently contains a discussion of the NRC approved Fire Protection Program as required by Generic Letter 88-12 and will reference the TRM.

The current fire protection license condition is consistent with the standard wording recommended in GL 88-12.⁽²⁾ The license condition allows changes to the fire protection program only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. The changes proposed herein are consistent with the current fire protection license condition.

The modifications to Technical Specification 6.5.1.6 provides specifically that the PORC is responsible for review of the

(2) Frank T. Miraglia letter to All Power Reactor Licensees and Applicants, "Removal of Fire Protection Requirements from Technical Specifications (Generic Letter 88-12)," dated August 2, 1988.

unit's Fire Protection Program and implementing procedures. Similarly the modifications to Technical Specification 6.5.2.6 provides specifically that the SORC is responsible for review of the common site Fire Protection Program and implementing procedures not reviewed by PORC.

The changes proposed in this package are administrative in nature in that no current Fire Protection Program requirements are being altered over and above that allowed by Generic Letter 88-12 aside from the deletion of the requirement to provide special reports. The items allowed to be relocated by Generic Letter 88-12 are being placed in the TRM. These actions are in accordance with Generic Letters 86-10 and 88-12.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed changes and has concluded that they do not involve a significant hazards consideration. The bases for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve a significant hazards consideration because the changes would not:

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

The proposed changes relocates the provisions of the Fire Protection Program that are contained in the Technical Specifications and places them in the TRM. No current requirements are being added or deleted aside from removal of the special reports section. Review of the Fire Protection Program and its revisions will be the responsibility of the PORC and SORC, just as it has always been the responsibility of these groups to review changes to the fire protection Limiting Condition for Operation and Surveillance Requirements when they were part of the Technical Specifications. In addition, no design basis accidents are affected by this change, nor are safety systems adversely affected by the changes. Therefore, there is no impact on the probability of occurrence or the consequences of any design basis accidents.

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

The proposed changes relocate the provisions of the Fire Protection Program that are contained in the Technical Specifications and places them in the TRM. No current requirements are being added or deleted aside from removal of the special report section. There are no new failure modes

associated with the proposed changes. Since the plant will continue to operate as designed, the proposed changes will not modify the plant response to the point where it can be considered a new accident.

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

No change is being proposed for the Fire Protection Program requirements themselves. The relevant Technical Specifications are being relocated, and the requirements contained therein are being incorporated into the TRM. Plant procedures will continue to provide the specific instructions necessary for the implementation of the requirements, just as when the requirements resided in the Technical Specifications. Fire Protection Program changes will be governed by the provisions of 10CFR50.59 and the current fire protection license condition. As such, the changes do not directly affect any protective boundaries nor does it impact the safety limits for the boundary. Thus, there are no adverse impacts on the protective boundaries, safety limits, or margin of safety.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are considered not likely to involve a significant hazards consideration. Although the proposed changes are not enveloped by a specific example, the proposed changes would not involve a significant increase in the probability or consequences of an accident previously analyzed. As previously stated, the removal of the Fire Protection-Related Technical Specifications from the Technical Specifications has no adverse impact upon plant operation or safety. Since operability and surveillance requirements will remain in a controlled document, the changes do not reduce the effectiveness of Technical Specification requirements. Any changes to the Fire Protection Program requirements will be made in accordance with the provisions of 10CFR50.59 and the fire protection license condition.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the type 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 changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

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Attachment 1 presents the marked-up copy of the affected License Condition and Technical Specifications. The retype of the proposed changes to License Condition and Technical Specifications are included in Attachment 2 and reflect the currently issued version of Technical Specifications.

Revision bars are provided in the right-hand margin to indicate a revision to the text. No revision bars are utilized when the page is changed solely to accommodate the shifting of text due to additions or deletions.

The Millstone Unit No. 2 Nuclear Review Board as well as the Site Nuclear Review Board have reviewed and approved this proposed amendment and concur with the above determination.

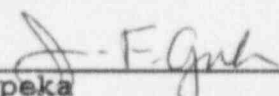
In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

Regarding our proposed schedule for this amendment, we request issuance of your earliest convenience with amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

If you should have any questions on the above, please contact Mr. R. S. Peterson at (203) 440-2074.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

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Subscribed and sworn to before me

this 21st day of December, 1994

Loraine J. DiAmico

Date Commission Expires: 3/31/98