

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NORTH CONN. WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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June 10, 1991

Docket No. 50-336
B13830

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Proposed Change to Technical Specifications
Shutdown Margin Special Test Exception

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

Discussion

The existing Technical Specification 4.10.1.2, "Special Test Exceptions, Shutdown Margin Surveillance Requirements," states that each control element assembly (CEA) not fully inserted shall be demonstrated capable of full insertion when tripped from at least the 50% withdrawn position within 24 hours prior to reducing the shutdown margin to less than the limits of Specification 3.1.1.1.

Subsequent to a refueling outage, low power physics testing is performed to verify physics parameters. The tests which determine CEA group worths may result in a reduction of the shutdown margin below that normally required for operation in Modes 2 and 3. Prior to reducing the shutdown margin below the technical specification limits, any CEA not fully inserted is required to have been demonstrated capable of full insertion within the past 24 hours. The group worth tests typically commence more than 24 hours after the CEA drop time surveillance. As such, compliance with the present surveillance requirements results in an additional scram. This scram causes increased component wear, complicates and delays completion of low power physics tests, and results in decreased plant availability. As such, the proposed change will extend the time prior to the reduction of shutdown margin, such that CEA insertion capability will be demonstrated within the previous 7 days rather than within the previous 24 hours.

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Significant Hazards Consideration

The proposed technical specification change has been reviewed against the criteria of 10CFR50.92 and it has been determined not to involve a significant hazards consideration. Specifically, the proposed change does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously analyzed. Technical Specifications require the surveillance for the CEA drop time to be performed following reactor reassembly. During reactor operation, it is typically many months between uses of the reactor trip system that include the full insertion of the CEAs. The change in the surveillance from 24 hours to 7 days will still result in a test being performed far more frequently than would occur during normal operation. Therefore, there is not a significant change in the probability of failure for any safety system.
2. Create the possibility of a new or different kind of accident from any previously analyzed. This proposed Technical Specification change does not modify plant response such that it could be considered a new accident. There are no new credible failure modes associated with this change. The results and effects of the change are consistent with those accidents already analyzed.
3. Involve a reduction in the margin of safety. Neither the drop time nor the CEA worth is affected by the change. Therefore, there is no impact on the performance of any safety system. There is no increase in the consequences of any accident and, as such, there is no reduction in the margin of safety.

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, in some respects, resemble example (vi). This example involves 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 as specified in the Standard Review Plan (e.g., a change resulting from the application of a small refinement to a previously used calculational model or design method). As with this example, NNECO's proposed amendment involves no significant hazards consideration.

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

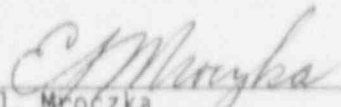
NNECO respectfully requests that this proposed change be issued prior to the start of the next refueling outage currently planned for March 1992. NNECO also requests this license amendment be effective as of the date of its issuance, to be implemented within 30 days of issuance.

U.S. Nuclear Regulatory Commission
B13830/Page 3
June 10, 1991

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



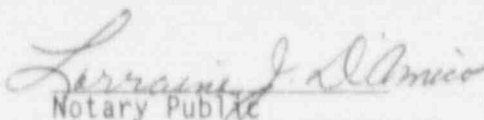
E. J. Mroczka
Senior Vice President

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

T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. Habighorst, Resident Inspector, Millstone Unit No. 2
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

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.



Notary Public
My Commission Expires March 31, 1993