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September 11, 1995

Docket No. 50-336
B15349

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 2
Proposed Technical Specifications Revision
Administrative Changes to Technical Specifications

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, DPK-65, by incorporating the attached changes into the Technical Specifications of Millstone Unit No. 2. The proposed changes affect Technical Specification Sections 3.4.8 and 3.9.9, Tables 2.2-1, 3.3-3, 3.3-5 and 3.3-8, and Bases Sections 3/4.2.1, 3/4.4.8, and 3/4.11.2.1. These changes combine several different administrative changes which will correct typographical errors, provide clarification or make editorial changes.

The proposed changes to Section 3.4.8 clearly state when Section 3.0.4 is not applicable. The current wording of Section 3.4.8, as changed by Amendment No. 151⁽¹⁾ which attempted to provide the clarification, failed to explicitly state the exception.

The proposed changes to Section 3.9.9 and Table 3.3-3 clarify the minimum number of channels of radiation monitors required for isolation of the containment purge valves.

The proposed change to Table 2.2-1 corrects a typographical error in Note (1). The thermal power is written incorrectly as " $\pm 5\%$ " rather than " $\geq 5\%$."

The proposed change to Table 3.3-5 is an editorial change that eliminates the notation on Auxiliary Feedwater (AFW) response time which states that diesel start time is included. Since AFW response time is independent of the operability of the Emergency Diesel, the notation adds no value to the table information.

The proposed change to Table 3.3-8 corrects a typographical error.

(1) U.S. Nuclear Regulatory Commission letter to E. J. Mroczka, "Issuance of Amendment (TAC No. 77535)," dated February 26, 1991.

ADD1

The nominal elevation for entry 3.b of Table 3.3-8 should be 374 feet not 347 feet. This change was previously submitted to NRC in a letter dated December 16, 1994,⁽²⁾ as part of a proposed Technical Specification revision involving the service water pump flood protection. However, the proposed license amendment request is being withdrawn. Thus, only the proposed change to Table 3.3-8 is included here.

The proposed changes to the Bases Section 3/4.2.1 are editorial changes that replace references to figures and values that no longer exist with a new reference to the Core Operating Limits Report. Also, the reference to Section 3.1.3.2 is removed since the section was removed for Cycle 2 by Amendment No. 38.⁽³⁾ Another change removes an assumption regarding flux peaking augmentation factors when using excore detectors. The flux peaking augmentation factors do not apply when using the excore monitoring system.

The proposed change to the Bases Section 3/4.4.8 removes the references to Steam Generator Tube Rupture (SGTR) including a 1 gallon per minute (gpm) leak and loss of power (LOP). The SGTR is analyzed without a LOP, and only 0.5 gpm leakage from the intact steam generator (SG) is accounted for.

The proposed change to the Bases Section 3/4.11.2.1 removes the reference to the milk pathway in the method for calculating the instantaneous release rate limit for iodines, particulates, and tritium.

Additionally, a correction is proposed for an error in page numbering. In a letter to the NRC dated April 25, 1994,⁽⁴⁾ a proposed Technical Specification change related to Generic Letter 90-06 resulted in the creation of page "B 3/4 4-2a." However, page "B 3/4 4-2a" already existed in the Technical Specifications. Therefore, the preexisting page "B 3/4 4-2a" is now proposed to be changed to page "B 3/4 4-2b."

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- (2) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Service Water Pump Flood Protection," dated December 16, 1994.
- (3) U.S. Nuclear Regulatory Commission letter to D.C. Switzer, dated April 19, 1978.
- (4) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Generic Letter 90-06," dated April 25, 1994.

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Attachment 1 to this letter provides a safety assessment of the proposed changes. Attachment 2 is the determination of no significant hazards considerations. Attachment 3 is a copy of the marked-up version of the appropriate sections of the current Technical Specifications. Attachment 4 is the retyped Technical Specification sections.

NNECO has reviewed the proposed Technical Specification changes in accordance with 10CFR50.92 and concludes that the changes do not involve a significant hazards consideration. NNECO has also reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations and concludes that the changes do not increase the types and amounts of effluent that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Thus, NNECO concludes that the proposal satisfies 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

The Nuclear Safety Assessment Board or the previous Millstone Unit No. 2 Nuclear Review Board has reviewed the proposed changes to the Technical Specification sections and concurs with the above determinations. In accordance with 10CFR50.91(b), NNECO is providing the State of Connecticut with a copy of this proposed license amendment.


Since this proposed license amendment is not required to support continued safe operation, NNECO is requesting NRC review and approval at your earliest convenience with the amendment to be implemented within 60 days of issuance.

There are no commitments contained within this letter. If the NRC Staff should have any questions or comments regarding this submittal, please contact Mr. Mario Robles at (203) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
Vice President

cc: See Page 4

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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
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Subscribed and sworn to before me

this 11th day of September, 1995

Gerard P. van Noordwijk

Date Commission Expires: 12/31/97

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision
Administrative Changes to Technical Specifications

Safety Assessment of Proposed Changes

September 1995

**Millstone Nuclear Power Station, Unit No. 2
Proposed Technical Specifications Revision
Administrative Changes to Technical Specifications
Safety Assessment of Proposed Changes**

Description of Proposed Change

In a letter to the NRC dated August 9, 1990,⁽¹⁾ and supplemented by a letter dated January 10, 1991,⁽²⁾ a proposed revision to the Technical Specifications, based on Generic Letter 87-09, made changes to Section 3.4.8. The change was intended to clarify the exception to Section 3.0.4. The change, approved in Amendment 151, failed to explicitly state the exception. As a result, the following is proposed to be added to action statement "a" of Section 3.4.8 for Modes 1,2, and 3: "Specification 3.0.4 is not applicable." Also, the statement, "Entry into an OPERATIONAL MODE or other specified condition is permitted pursuant to Specification 3.0.4 when subject to this ACTION statement" is proposed to be changed to, "Entry into an OPERATIONAL MODE or other specified condition is permitted in accordance with the ACTION statements."

At Millstone Unit No. 2, one gaseous and particulate radiation monitor channels are currently specified to be available. In Table 3.3-3, each channel is stated to have two sensors which are both available to initiate isolation of the containment purge valve. Operability of the channel has been interpreted as requiring only one of the two sensors to be operable. Since each sensor is completely independent, however, it is more appropriate to call each sensor a channel. The proposed changes to Table 3.3-3 and Section 3.9.9 specifies that one channel each of gaseous and particulate monitors be operable.

The Millstone Unit No. 2 reactor trip signals on Reactor Coolant System (RCS) low flow and Thermal Margin Low Pressure (TM/LP) allow the trips to be bypassed at less than 5% power and require the trips to be in effect at greater than or equal to 5% power. Note (1) of Table 2.2-1, however, is written incorrectly as " $\pm 5\%$ "

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- (1) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Changes Suggested by Generic Letter 87-09," dated August 9, 1990.
- (2) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Response to Request for Additional Information, Generic Letter 87-09 (TAC No. 77535)," dated January 10, 1991.

rather than "> 5%." The proposed change to Table 2.2-1 corrects a typographical error in Note (1) by replacing "+" with ">" in front of the "5%."

The response time for Auxiliary Feedwater (AFW) was listed as 240 seconds including diesel start and sequence time and 240 seconds without including diesel start and sequence time. The AFW start time, however, is independent of the diesel start and sequence time since the 3 minute (minimum) AFW time delay provides adequate time to accomplish diesel start and sequencing. The commitment to remove the notation was made in a letter to the NRC dated November 20, 1992.⁽³⁾ The proposed change eliminates the Diesel Generator starting and sequence loading delay notation. Specifically, in the Table 3.3-5, the references to Notations (*) and (2) in the item 8.a. response time and the Notation (2) itself are deleted. The response time for the AFW System will be simply, "≤ 240" seconds.

A typographical error was introduced to the Millstone Unit No. 2 Technical Specifications, Table 3.3-8, in Amendment No. 45. The nominal elevation for entry 3.b of Table 3.3-8 should be 374 feet not 347 feet.

Millstone Unit No. 2 is equipped with an Incore Detector Monitoring System and an Excore Detector Monitoring System. These systems monitor core power distribution and are capable of verifying that the Linear Heat Rate (LHR) does not exceed its limits. Only the Incore Detector Monitoring System provide alarm setpoints that include an allowance for a flux peaking augmentation factor. The current Technical Specification Bases Section 3/4.2.1, however, erroneously includes the following assumption for the Excore Detector Monitoring System: "2) the flux peaking augmentation factors are as shown in Figure 4.2-1." The proposed change eliminates this erroneous statement in regard to the Excore Detector Monitoring System. Specifically, the following is proposed to be removed from the Bases Section 3/4.2.1: "2) the flux peaking augmentation factors are as shown in Figure 4.2-1." Additionally, references to figures and values that are no longer found in the Technical Specifications are proposed to be replaced with a reference to the Core Operating Limits Report. The

(3) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Main Steam Line Break Design Limits, Response to Request for Additional Information," dated November 20, 1992.

reference to Technical Specification Section 3.1.3.2 is also proposed to be removed since Section 3.1.3.2 was removed for Cycle 2 by Amendment No. 38.⁽⁴⁾

Limitations on the specific activity of the primary coolant following a Steam Generator Tube Rupture (SGTR) are established to ensure that the resulting 2 hour doses at the site boundary will not exceed the 10CFR100 limits. In the Bases Section 3/4.4.8 for Specific Activity, however, the SGTR accident is stated to be in conjunction with a 1 gallon per minute (gpm) leak and a concurrent loss of power (LOP). The analysis of the SGTR in the Final Safety Analysis Report (FSAR), however, does not include a LOP. In addition, only a 0.5 gpm leakage from the intact Steam Generator (SG) is accounted for. The 0.5 gpm leak from the ruptured SG is insignificant as it is overwhelmed by the postulated break flow. The proposed change to the Bases Section 3/4.4.8 removes the references to a 1 gpm leak and LOP.

The limiting condition for operation (LCO) related to offsite dose rate due to radiological materials released from the site is found in Technical Specification Section 3.11.2.1. It includes a dose rate limit due to inhalation for iodines, particulates, and tritium. The "inhalation pathway" is also used in the NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors, Generic Letter 89-01, Supplement No. 1," in its sample Bases Section 3/4.11.2.1. However, the Millstone Unit No. 2 Technical Specification Bases Section 3/4.11.2.1 refers to the "milk pathway" in the method for calculating the release rate limit. The change to the Bases Section 3/4.11.2.1 replaces the reference to the "milk pathway" with "inhalation pathway" to make it consistent with Section 3.11.2.1.

In a letter to the NRC dated April 25, 1994,⁽⁵⁾ a proposed Technical Specification change related to Generic Letter 90-06 resulted in the creation of page "B 3/4 4-2a." However, page "B 3/4 4-2a" already existed in the Technical Specifications. Therefore, the preexisting page "B 3/4 4-2a" is now proposed to be changed to page "B 3/4 4-2b."

(4) U.S. Nuclear Regulatory Commission letter to D.C. Switzer, dated April 19, 1978.

(5) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, Generic Letter 90-06," dated April 25, 1994.

Safety Assessment

Technical Specification Section 3.0.4 permits entry into an operational mode only when the action statements for an LCO permit continued operation for an unlimited period of time. However, Section 3.4.8 is in conflict with Section 3.0.4 because it invokes Section 3.0.4 while at the same time limiting operation under the action statement to 48 hours. This is resolved by taking exception to Section 3.0.4. Since this was the original intent of the earlier Technical Specification amendment, this proposed change is editorial and does not affect safety.

Since there are no area monitors which automatically initiate containment purge valve isolation, the operability requirement in Section 3.9.9 is not necessary. The proposed changes do not decrease the minimum channel availability. The proposed changes are administrative changes that make the Technical Specifications consistent with existing conditions and does not affect safety.

The proposed change to the Table 2.2-1, Notation (1) is to correct a typographical error by replacing a \leq symbol with a \pm symbol and does not affect safety.

The proposed changes to Table 3.3-5 are only editorial changes and does not affect safety. The changes delete information that is not relevant to the Table. The AFW start times are independent of the diesel generator.

The proposed change to Table 3.3-8 is to correct a typographical error by replacing "347 ft." with "374 ft." and does not affect safety.

The proposed changes to the LHR Bases Section 3/4.2.1 are editorial and does not affect safety. There are no changes to the LHR limits, measurement uncertainties, or monitoring methods.

The proposed change to the Bases Section 3/4.4.8 corrects an erroneous statement that the postulated accident occurs in conjunction with a 1 gpm leak and a concurrent LOP. The SGTR presented in the FSAR does not have a LOP and only a 0.5 gpm leakage from the intact SG is accounted for. The 0.5 gpm leak from the ruptured SG is overwhelmed by the break flow. This change corrects an error in the bases and does not affect safety.

The proposed change to the Bases Section 3/4.11.2.1 is administrative to make it consistent with the actual LCO requirement in Section 3.11.2.1, thus it does not affect safety.

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The proposed change involving page B 3/4 4-2a corrects an error in pagination and does not affect safety.

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision
Administrative Changes to Technical Specifications

Determination of No Significant Hazards Considerations

September 1995

**Millstone Nuclear Power Station, Unit No. 2
Proposed Technical Specifications Revision
Administrative Changes to Technical Specifications
Determination of No Significant Hazards Considerations**

Pursuant to 10CFR50.92, NNECO has reviewed the proposed changes. NNECO concludes that these changes do not involve a significant hazards consideration since the proposed change satisfies the criteria in 10CFR50.92(c). That is, the proposed changes do not:

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

The proposed changes are administrative in nature and do not result in changes to plant configuration, operation, accident mitigation, or analysis assumptions. Thus, it cannot increase the probability or consequence of an accident.

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

The proposed changes are administrative in nature and do not result in changes to plant configuration, operation, accident mitigation, or analysis assumptions. The intent and application of the proposed specification will not change. Therefore, the proposal 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.**

Since the proposed change are administrative in nature and do not result in changes to plant configuration, operation, accident mitigation, or analysis assumptions, there is no reduction in the 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. The proposed changes described herein resemble example (i), a purely administrative change to technical specifications, which for example include a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. The editorial changes have no effect on the protective boundaries or the margin of safety.

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Attachment 3

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision
Administrative Changes to Technical Specifications

Marked-up Version of Current Technical Specifications

September 1995