

Northeast  
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
(203) 665-5000

November 20, 1995

Docket No. 50-336  
B15432

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  
Radioactive Liquid Effluent Monitoring Instrumentation

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, DPR-65, by incorporating the attached changes into the Technical Specifications of Millstone Unit No. 2. The proposed changes affect Technical Specifications Table 3.3-12.

The proposed changes to Table 3.3-12 provide clarifications to the applicability and action statements of the radioactive liquid effluent monitoring instrumentation. These changes will resolve a deficiency (95-201-05) noted in the NRC Restart Assessment Team Inspection Report of Millstone Unit No. 2 dated July 21, 1995.<sup>(1)</sup>

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 pages of the current Technical Specifications. Attachment 4 is the retyped Technical Specification pages.

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

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(1) U.S. Nuclear Regulatory Commission letter to J. F. Opeka, "NRC Inspection Report 50-336/95-201, Millstone Nuclear Power Station Unit 2, Restart Assessment Team Inspection," dated July 21, 1995.

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that the proposal satisfies 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

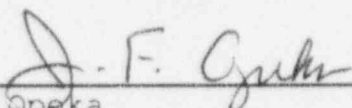
The Nuclear Safety Assessment Board has reviewed the proposed changes to the Technical Specifications and concurs with the above determinations. In accordance with 10CFR50.91(b), NNECO is providing the State of Connecticut with a copy of this proposed license amendment.

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 (860) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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J. F. Opeka  
Executive Vice President

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

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Subscribed and sworn to before me

this 20<sup>th</sup> day of Nov., 1995

Lorraine J. D'Amico

Date Commission Expires: 3/31/98

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Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision  
Radioactive Liquid Effluent Monitoring Instrumentation

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**Millstone Nuclear Power Station, Unit No. 2  
Proposed Technical Specifications Revision  
Radioactive Liquid Effluent Monitoring Instrumentation  
Safety Assessment of Proposed Changes**

**Description of Proposed Change**

The first of the proposed changes provides clarification to the applicability statement for the steam generator blowdown monitor in Table 3.3-12. The applicability is changed to be for Modes 1-4 only.

The applicability is being clarified because in Modes 1-4, steam generator blowdown is continuously in service, and therefore the radiation monitor is required to be operable. However, in Modes 5 and 6, steam generator blowdown is not in service, and therefore the radiation monitor is not required to be in service. Steam generator discharges in Modes 5 and 6 are batch discharges. Station procedures require sampling prior to discharge.

The second change involves the action statement for the steam generator blowdown monitor in Table 3.3-12, Action 2. The action required when the monitor is not operable is clarified to state that if discharges are suspended, no sampling is required.

The last change involves the applicability statement for the condensate polishing facility waste neutralizing sump radiation monitor. It is clarified to state that the monitor is only required when the pathway is in use.

**Safety Assessment**

The proposed changes are administrative in nature and are intended to clarify the applicability and actions of Technical Specification 3.3.3.9, Limiting Condition for Operation (LCO) for Radioactive Liquid Effluent Monitoring Instrumentation.

The above changes do not change the intent of the requirements, but rather make the Technical Specifications consistent with existing conditions. Therefore, the changes are considered safe.

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Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision  
Radioactive Liquid Effluent Monitoring Instrumentation  
Determination of No Significant Hazards Considerations

November 1995



**Millstone Nuclear Power Station, Unit No. 2  
Proposed Technical Specifications Revision  
Radioactive Liquid Effluent Monitoring Instrumentation  
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 changes satisfy 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 evaluated.

The proposed changes clarify the modes and conditions for which the radiation monitors are utilized, as well as the required actions when the monitors are not operable. These changes are administrative in nature, therefore, the changes will not increase the probability or consequences of an accident previously evaluated.

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

The proposed changes have no affect on the ability of the monitors to perform their design function. The clarifications do not involve any physical modifications to any equipment, structures, or components. The proposed changes have no impact on design basis accidents, and the changes will not modify plant response or create a new or unanalyzed event.

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

These changes do not have any impact on the protective boundaries and, therefore, have no impact on the safety limits for these boundaries. The instrumentation associated with these changes do not provide a safety function and only serve to provide radiological information to plant operators. The instrumentation has no affect on the operation of any safety-related equipment. No hardware, software, or setpoint changes are involved in this proposed change. These changes provide clarification of modes and conditions for which the radiation monitors are utilized. As such, these changes have no impact on 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

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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 administrative 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  
Radioactive Liquid Effluent Monitoring Instrumentation  
Marked-up Version of Current Technical Specifications

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