



January 22, 1996

Docket No. 50-336  
B15479

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  
Containment Isolation Valves

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 Sections 1.8.1.a, 4.6.1.1.a, 3.6.3.1, 4.6.3.1.1, 4.6.3.1.2, and Table 3.6-2 and Bases Section 3/4.6.3. The change to Section 4.6.1.1.a, however, is on the same page of the Technical Specifications as Section 4.6.1.1.d which has been proposed to be changed in a separate letter dated January 16, 1996,<sup>(1)</sup> which addressed performance-based containment leakage testing requirements described in 10CFR50, Appendix J, Option B. The proposed changes contained in this letter presume approval of the changes contained in the letter of January 16, 1996. If the proposed changes previously submitted are not approved, then NNECO will withdraw this request and resubmit the changes proposed herein based on the unchanged section.

The proposed changes in this letter relocate the containment isolation valve list, Table 3.6-2, from the Technical Specifications to the Technical Requirements Manual. The changes are being performed in accordance with NRC Generic Letter (GL)

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- (1) E. A. DeBarba letter to U. S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 2, Proposed Revision to Technical Specifications, 10CFR50 Appendix J, Primary Reactor Containment Leakage Testing Requirements for Light-Water Cooled Power Reactors Option B, Performance-Based Requirements," dated January 16, 1996.

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91-08,<sup>(2)</sup> which provides guidance for removal of component lists from the Technical Specifications.

Additionally, a change to provide relief in the surveillance requirement in Section 4.6.1.1a is included. The change allows valves, blind flanges, and deactivated automatic valves located inside the containment and are locked, sealed, or otherwise secured in the closed position, be verified closed during each cold shutdown but not more often than once per 92 days. The current requirements check the valve position once per 31 days.

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 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 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 subsequent to an action on the proposed license amendment of January 16, 1996, with the amendment to be implemented within 90 days of issuance.

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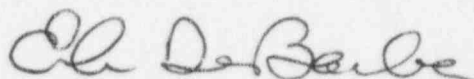
(2) J. G. Partlow letter to All Holders of Operating Licenses or Construction Permits for Nuclear Power Reactors, "Removal of Component Lists from Technical Specifications (Generic Letter 91-08)," dated May 6, 1991.

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There are no commitments contained within this letter. If the NRC Staff should have any questions or comments regarding this submittal, please contact Mr. M. Robles Jr. at (860) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY




E. A. DeBarba  
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  
No. 2

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 22nd day of January, 1996



Date Commission Expires: 12/31/1997

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision  
Containment Isolation Valves

Safety Assessment of Proposed Changes

January 1996

**Millstone Nuclear Power Station, Unit No. 2  
Proposed Technical Specifications Revision  
Containment Isolation Valves  
Safety Assessment of Proposed Changes**

**Description of Proposed Changes**

The proposed change relocates the containment isolation valve (CIV) list, Table 3.6-2, from the Technical Specifications to the Technical Requirements Manual (TRM). This change affects Technical Specifications Sections 1.8.1a, 4.6.1.1a, 3.6.3.1, 4.6.3.1.1 and 4.6.3.1.2, and the Basis Section 3/4.6.3. A note at the bottom of Table 3.6-2 regarding the CIVs that are subject to administrative control is retained in the Technical Specifications by relocating it to Sections 1.8.1a and 4.6.1.1a. This change is being performed in accordance with Generic Letter 91-08, which provides guidance for removal of component lists from the Technical Specifications.

Additionally, a change to provide relief in the surveillance requirement in Section 4.6.1.1a is included. The change allows valves, blind flanges, and deactivated automatic valves located inside the containment and are locked, sealed, or otherwise secured in the closed position to be verified closed during each cold shutdown but not more often than once per 92 days. The current requirements check the valve position once per 31 days.

**Safety Assessment**

Relocation of the CIV list does not affect the designation of any individual valve as a CIV, nor does it reduce the operability and testing requirements for any valve. Any intent change to the TRM list will require a 10CFR50.59 evaluation. The 10CFR50.59 evaluation involves a review of the three criteria of 10CFR50.59(a)(2) to determine if the proposed change involves an unreviewed safety question. Also, a Plant Operations Review Committee review and approval of a proposed change will be required. This process ensures that a thorough review is performed before changes are made to the CIV list. This proposed change does not diminish any other regulatory or technical specification requirement for the valves. Since this change only involves the type of controlled document used to maintain the list of CIVs, and does not affect the operability, maintenance, testing, or use of the valves, there is no adverse effect on plant safety.

The change to the surveillance requirement in Section 4.6.1.1a reduces the number of surveillances from once per 31 days to once each cold shutdown but not more often than once per 92 days. This change is consistent with NUREG-1432, "Standard Technical

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Specifications for Combustion Engineering Plants," that shows that the surveillance frequency of "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is appropriate. The surveillance frequency specified in NUREG-1432 recognizes that these valves and blind flanges are inside containment and, therefore, access to them during Modes 1, 2 and 3 is restricted. Thus, the probability of misalignment, once they have been verified to be in their proper position, is small. This change would make the Millstone Unit No. 2 Technical Specifications consistent with Technical Specifications of Millstone Unit No. 3, Haddam Neck Plant, and Seabrook.



Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Technical Specifications Revision  
Containment Isolation Valves

Determination of No Significant Hazards Considerations

January 1996

**Millstone Nuclear Power Station, Unit No. 2  
Proposed Technical Specifications Revision  
Containment Isolation Valves  
Determination of No Significant Hazards Considerations**

Pursuant to 10CFR50.92, Northeast Nuclear Energy Company (NNECO) has reviewed the proposed changes. NNECO concludes that these changes do not involve a significant hazards consideration (SHC) 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 change to remove the Containment Isolation Valve (CIV) list from the Technical Specifications will not result in any hardware or operating changes. The proposed change is based upon NRC Generic Letter (GL) 91-08 and merely removes the CIV table and all references to the table from the technical specifications without affecting the operability requirements of any of the listed valves. The technical specifications will continue to require the CIVs to be operable. Limiting Condition for Operation and surveillance requirements for the valves will also remain in the technical specifications. The CIV table will be relocated to the Millstone Unit No. 2 Technical Requirements Manual (TRM) which is controlled in accordance with 10CFR50.59.

This change is administrative in nature and does not involve an increase in the probability or consequence of an accident previously evaluated. Furthermore, the proposed change does not alter the design, function, or operation of the valves involved, and therefore does not affect the probability or consequences of any previously evaluated accident.

The change to Section 4.6.1.1a that reduces the surveillance requirement for valves, blind flanges, and deactivated automatic valves located inside the containment provides consistency with NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants" as well as the Technical Specifications of Millstone Unit No. 3, Haddam Neck Plant, and Seabrook. The probability or consequences of any previously evaluated accidents are not affected.

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

The change to relocate the CIV list from the technical



specifications to the TRM will not impose any different operational or surveillance requirements, nor will the change remove any such requirements. Adequate control of information will be maintained. Furthermore, as stated above, the proposed change does not alter the design, function, or operation of the valves involved, and therefore no new accident scenarios are created.

The change to Section 4.6.1.1a that reduces the surveillance requirement for valves, blind flanges, and deactivated automatic valves located inside the containment does not alter the design, function, or operation of the valves involved, and therefore no new accident scenarios are created.

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

The proposed changes will not reduce the margin of safety since it has no impact on any safety analysis assumption. The proposed changes do not decrease the scope of equipment currently required to be operable or subject to surveillance testing, nor does the proposed change affect any instrument setpoints or equipment safety functions.

The relocation of the valve list is consistent with the guidance provided in GL 91-08. The change to the surveillance interval is consistent with NUREG-1432, "Standard Technical Specifications for Combustion Engineering Plants" as well as the Technical Specifications of Millstone Unit No. 3, Haddam Neck Plant, and Seabrook. The intent of the technical specification will be met since the change will not alter function or operability requirements for any CIV.

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 an SHC. While the proposed changes are not enveloped by a specific example, it has been shown that the proposed changes are safe and do not involve an SHC.