

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 666-6911

March 29, 1985

Docket No. 50-336
B11492

Director of Nuclear Reactor Regulation
Attn: Mr. James R. Miller
Operating Reactors Branch #3
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Diesel Generator Testing

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

The proposed technical specification revision is provided as Attachment 1. This change deletes diesel generator surveillance requirement 4.8.1.1.2.c.5.d in accordance with NRC Generic Letter 83-30. The subject surveillance requirement requires that:

- (1) On simulated loss of diesel generator (with off-site power not available) the loads are shed.
- (2) The failed diesel generator is reconnected to the emergency bus.
- (3) Loads are sequenced onto the bus through the load sequencer in accordance with the design requirements.

The current requirement is in excess of the scope outlined in 10CFR50 Appendix A General Design Criterion 17 (GDC) and is not consistent with the provisions of GDC-17, Regulatory Guide 1.108 and the NRC Standard Review Plan (8.2 and 8.3.1). The remaining surveillance testing requirements are sufficient to demonstrate full functional operability and independence of the diesel generator units. Specifically, to verify interaction of on-site power sources (with loss of off-site power) with load shed feature, the following tests are specified in the Millstone Unit No. 2 Technical Specifications:

- (1) Verifying that on loss of off-site power the emergency buses have been deenergized and that the loads have been shed from the emergency buses.

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- (2) Verifying that on loss of off-site power the diesel generators start from ambient condition on the auto-start signal, the emergency buses are energized with permanently connected loads, the auto-connected emergency loads are energized through the load sequencer, and the system operates for five minutes while the generators are loaded with the emergency loads.

Testing to satisfy these surveillance requirements demonstrates the capability of the on-site power system to perform its required functions and conformance with GDC-17 and NRC regulatory guide criteria.

NNECO has reviewed the attached proposed change pursuant to 10CFR 50.59 and has determined that it does not constitute an unreviewed safety question. Specifically, the margins of safety as defined in each Technical Specification Basis are maintained. In addition, the probability of occurrence or the consequences of a previously analyzed accident have not been increased, the possibility for a new type of accident not previously evaluated has not been created. The proposed change eliminates unnecessary testing while the remaining required surveillance testing demonstrates full functional operability of the diesel generator units.

NNECO has reviewed the proposed changes, in accordance with 10CFR 50.92, and has concluded that they do not involve a significant hazards consideration. The basis for this conclusion is that the criteria of 10CFR 50.92(c) are not compromised, a conclusion which is supported by our determinations made pursuant to 10CFR 50.59. Additionally, the Commission has provided guidance concerning the application of the standards in 10CFR 50.92(c) by providing certain examples (48FR 14870). One of the examples (vii) of actions not likely to involve a significant hazards consideration relates to changes to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. The proposed change eliminates unnecessary testing which could reduce the reliability of the tested components as recommended by NRC Generic Letter 83-30. Full conformance with NRC regulations is maintained.

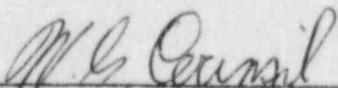
The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved the attached proposed revision and has concurred with the above determinations.

In accordance with 10CFR 50.91(b), NNECO is providing the State of Connecticut a copy of this proposed amendment.

Pursuant to the requirements of 10CFR 170.12(c), enclosed with this request is the application fee of \$150.00.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

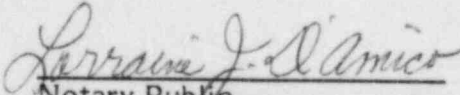


W. G. Council
Senior Vice President

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

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me W. G. Council, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, 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, 1988

Docket No. 50-336

Attachment 1

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specification
Diesel Generator Testing

March, 1985