

NORTHEAST UTILITIES

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

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April 4, 1985

Docket No. 50-336
B11500

Director of Nuclear Reactor Regulation
Attn: Mr. James R. Miller, Chief
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
ECCS Subsystems

Pursuant to 10 CFR 50.90 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. Specifically, Technical Specification Section 4.5.2.c.3 is revised to delete a reference to the physical description (granular or solid) of the trisodium phosphate dodecahydrate (TSP). Technical Specification 4.5.2.c.3 requires verification that a sufficient volume of TSP is contained in the TSP storage baskets and, since TSP cannot be both "solid" and "granular", the proposed change eliminates possible misinterpretation of the physical description of the TSP.

NNECO has reviewed the attached proposed change pursuant to 10 CFR 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 bases are maintained. In addition, the probability of occurrence or the consequences of a previously analyzed accident have not been increased and the possibility for a new type of accident not previously evaluated has not been created. The proposed change deletes the words "solid granular" in order to avoid a possible misinterpretation of the TSP description. However, the functional requirement of Specification 4.5.2.c.3 is not changed and the proposed change does not adversely affect safety at the plant.

NNECO has reviewed the proposed change, in accordance with 10 CFR 50.92, and has concluded that it does not involve a significant hazards consideration. The basis for this conclusion is that the criteria of 10 CFR 50.92(c) are not compromised, a conclusion which is supported by our determinations made pursuant to 10 CFR 50.59. Additionally, the Commission has provided guidance for the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870) of actions likely to involve no significant hazards considerations. One of the examples, (i), relates to a purely administrative

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change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. As discussed above, the proposed revision eliminates a possible misinterpretation of the physical description of TSP while not affecting the requirement of Technical Specification 4.5.2.c.3. Thus, the proposed change is purely administrative in nature and similar to example (i) described above.

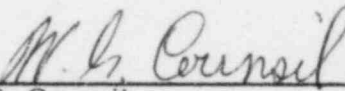
The Millstone Unit No. 2 Nuclear Review Board has reviewed the proposed revision and has concurred with the above determinations.

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

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

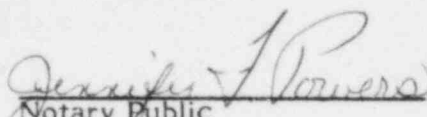


W. G. Council
Senior Vice President

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, 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, 1989