Northeast
Utilities System

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August 27, 1996

Docket No. 50-336
B15865

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specification
Charging Pump - Shutdown

Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Facility Operating License No. DPR-65 by incorporating changes to the Millstone Unit No. 2 (MP2) Technical Specifications as described herein. This license amendment request is submitted pursuant to the requirements of 10CFR50.90.

NNECO proposes to change the wording of the "Charging Pump - Shutdown" Technical Specification. Changes are proposed to Limiting Condition for Operation (LCO) 3.1.2.3, Action 3.1.2.3.b, and Surveillance Requirements 4.1.2.3.2 and 4.1.2.3.3. The proposed changes clarifies the LCO and Surveillance Requirements performed to verify that the appropriate number of charging pumps and high pressure safety injection pumps are rendered incapable of injecting into the Reactor Coolant System (RCS) to minimize the potential for a low temperature overpressure event. Without this change, all inoperable charging pumps and high pressure safety injection pumps would be incapacitated which would adversely affect the boration and makeup capability required during shutdown.

This change does not require a BASES change since the intent and technical evaluation in support of this specification remain unchanged.

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In support of this proposed license amendment:

- Attachment 1 provides a description of the proposed change and a safety assessment for the change.

- Attachment 2 provides the determination of No Significant Hazards Consideration (SHC).

- Attachment 3 provides the marked-up version of the appropriate pages of the current Technical Specifications.

- Attachment 4 contains the retyped Technical Specification pages.

On April 17, 1996, with the unit in COLD SHUTDOWN, the Facility 2 Emergency Diesel Generator (EDG) was determined to be inoperable during a routine surveillance and has subsequently been undergoing repairs. When the Facility 1 EDG is surveilled with the Facility 2 EDG inoperable, there are no emergency sources of power available for the purpose of having OPERABLE charging pumps and HPSI pumps as required by Technical Specification 3.1.2.3.

The current Millstone Unit No. 2 Technical Specifications require all inoperable charging pumps and HPSI pumps to be rendered incapable of injecting into the RCS; for example, by having the charging pump motor circuit breakers in the open position. Therefore, the current Technical Specification requires that, during the Facility 1 EDG surveillance test, all charging and HPSI pumps be rendered incapable of injecting into the RCS. The proposed change uses wording consistent with the Improved Standard Technical Specifications for Combustion Engineering plants (NUREG-1432) and will only require those charging pump(s) and HPSI pump(s) required to be inoperable for low temperature overpressure protection to be rendered incapable of injecting into the RCS.

As discussed in Attachment 2, the proposed license amendment has been determined not to involve a Significant Hazards Consideration (SHC) pursuant to 10CFR50.92. Additionally, the proposed license amendment does not increase the types or amounts of effluents that may be released offsite, nor does it increase individual or occupational radiation exposure. The change makes additional makeup capability available and therefore, increases the availability of ECCS equipment to mitigate the consequences of an accident and could reduce offsite releases and radiological exposure. Based on the foregoing, NNECO has determined that this

license amendment request meets the criteria delineated in 10CFR51.22 (c)(9) for a categorical exclusion from the requirement for an environmental impact statement.

The Millstone Unit No. 2 Plant Operations Review Committee and the Nuclear Safety Assessment Board have reviewed and concurred with the above determinations.

In accordance with 10CFR50.91 (b), a copy of this proposed amendment is being provided to the State of Connecticut State Liaison Officer.

If you have any questions, please contact Mr. Michael D. Ehredt at (860) 440-2142.

Very truly yours,
NORTHEAST NUCLEAR ENERGY COMPANY

T. C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer

Attachments (4)

cc: H. J. Miller, Region I Administrator
D. G. McDonald, Jr., NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit No. 2
K. T. McCarthy, Bureau of Air Management, Department of Environmental Protection

Subscribed and sworn to before me

this 27th day of August, 1996

Date Commission Expires: 1/31/2000

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications

Charging Pump - Shutdown

Description of Proposed Changes

and

Safety Assessment

August 96

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Charging Pump - Shutdown

Description of Proposed Change

Limiting Condition for Operation 3.1.2.3, "Charging Pump - Shutdown," delineates the number of charging pumps and High Pressure Safety Injection (HPSI) pumps required to be OPERABLE when the plant is in MODES 5 and 6. The maximum number of pumps allowed to be capable of injecting is limited based on the relief capacity of the Reactor Coolant System (RCS). This limit ensures adequate low temperature overpressure protection against the maximum injection capability of the maximum number of allowed pumps. Surveillance Requirements 4.1.2.3.2 and 4.1.2.3.3 are designed to ensure that no more than the maximum number of charging and HPSI pumps, respectively, are capable of injecting into the RCS. These surveillances involve ensuring that the pumps required to be inoperable have their motor circuit breaker in the open position (for the charging pumps) or disconnected from their power supply circuits (for the HPSI pumps). Alternatively for the HPSI pumps, the discharge valve can be shut and tagged with the key lock on the control panel.

The proposed change revises the wording of Limiting Condition for Operation (LCO) 3.1.2.3, Action 3.1.2.3.b, and Surveillance Requirements 4.1.2.3.2 and 4.1.2.3.3. The proposed change clarifies the LCO and Surveillance Requirements performed to verify that the appropriate number of charging pumps and high pressure safety injection pumps are rendered incapable of injecting into the Reactor Coolant System (RCS) to minimize the potential for a low temperature overpressure event

Safety Assessment

In addition to specifying the maximum number of pumps capable of injecting into the RCS, Limiting Condition for Operation 3.1.2.3, "Charging Pump - Shutdown," also delineates the minimum number of charging pumps and High Pressure Safety Injection (HPSI) pumps required to be OPERABLE when the plant is in MODES 5 and 6. The minimum number of OPERABLE charging and HPSI pumps required is based on ensuring that negative reactivity control is available

during MODES 5 and 6 to provide a SHUTDOWN MARGIN within the limits of the CORE OPERATING LIMITS REPORT.

Recently at Millstone Unit 2, all charging and HPSI pumps were rendered inoperable during the monthly surveillance of the Facility 1 Emergency Diesel Generator (EDG). At that time, there were no emergency electrical power sources that could be credited for the charging and HPSI pumps since the Facility 2 EDG was also not available because it was undergoing repairs. The Millstone Unit 2 Technical Specifications definition of "OPERABLE - OPERABILITY" requires emergency electrical power sources be available.

Since all of the charging and HPSI pumps were rendered inoperable during the EDG surveillance, all of the charging pump motor circuit breakers were placed in the open position and the HPSI injection valves were tagged consistent with the present Surveillance Requirements 4.1.2.3.2 and 4.1.2.3.3. In so doing, the plant was placed in a less than optimum condition in that additional action (viz., local circuit breaker operation) would have been required should the charging pumps be needed. When the Bases are reviewed, it is clear that opening the motor circuit breakers is beyond the intent of the Limiting Condition for Operation and the Surveillance Requirement.

The proposed change simply clarifies that only the pumps required to be incapable of injecting into the RCS need to be surveilled. The change neither increases nor decreases the number of charging and HPSI pumps required to be OPERABLE during MODES 5 and 6. As a result, the change is considered to be safe.

Attachment 2

Millstone Nuclear Power Station, Unit No. 2

Proposed Revision to Technical Specifications

Charging Pump - Shutdown

No Significant Hazards Consideration (SHC)

August 96

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Charging Pump - Shutdown

No Significant Hazards Consideration Determination

In accordance with 10CFR50.92, NNECO has reviewed the proposed changes and has concluded that they do not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

1. Involve a significant increase in the probability or consequence of an accident previously evaluated.

   The change clarifies that only the pumps required to be incapable of injecting into the RCS need to be surveilled to verify their incapacitated status. The change continues to be consistent with the current Bases of the Technical Specifications for Boration Systems, 3/4.1.2 and uses wording similar to that in the Improved Standard Technical Specifications for Combustion Engineering plants (NUREG-1432). The change continues to ensure that reactivity control and makeup capability is available during each mode of facility operation and that adequate low temperature overpressure protection is provided. The change neither increases nor decreases the number of charging and HPSI pumps required to be OPERABLE during operation of the facility and therefore, it does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   The change clarifies that only the pumps required to be incapable of injecting into the RCS need to be surveilled to verify their incapacitated status. The change continues to be consistent with the current Bases of the Technical Specifications for Boration Systems, 3/4.1.2. It continues to ensure that reactivity control and makeup capability is available during each mode of facility operation and that adequate low temperature overpressure protection is provided. The change neither increases nor decreases the number of charging and HPSI pumps required to be

OPERABLE during operation of the facility and therefore, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The change is consistent with the Technical Specification Bases for Boration System, 3/4.1.2. It continues to ensure that reactivity control and makeup capability is available during each mode of facility operation and that adequate low temperature overpressure protection is provided. No changes in analysis assumptions are required and therefore, there is not a reduction in the margin of safety. On the contrary, maintaining reactivity control and makeup capability during each mode of facility operation while also ensuring adequate low temperature overpressure protection will actually increase the margin of safety.