

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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May 28, 1985

Docket No. 50-336
B11271

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

- References:
- (1) R. W. Reid letter to W. G. Council, dated September 19, 1978 transmitting Amendment No. 43 and the Fire Protection Safety Evaluation Report for Millstone Nuclear Power Station, Unit No. 2, Docket No. 50-336.
 - (2) D. G. Eisenhower letter to All Power Reactor Licensees with Plants Licensed Prior to January 1, 1979 (Generic Letter 81-12), dated February 20, 1981.
 - (3) D. G. Eisenhower letter to All Power Reactor Licensees And All Applicants For Power Reactor Licenses (Generic Letter 85-01), dated January 9, 1985.
 - (4) W. G. Council letter to R. W. Reid, dated January 3, 1980 transmitting proposed revisions to Table 3.3-10 of the Millstone Unit No. 2 Technical Specifications.
 - (5) W. G. Council letter to R. W. Reid, dated February 4, 1980 transmitting additional information on proposed revisions to Technical Specifications for Millstone Unit No. 2.
 - (6) R. W. Reid letter to W. G. Council, dated May 13, 1980 transmitting Amendment No. 57.

Millstone Nuclear Power Station, Unit No. 2
Proposed Revisions to Technical Specifications
Fire Protection

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, No. DPR-65, for Millstone Unit No. 2 by incorporating the attached changes into the plant Technical Specifications. The changes relate to fire protection systems including fire detectors, fire water pump diesels, spray and/or sprinkler systems, hose stations, and penetration fire barriers. The details of each of the changes are provided below.

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Technical Specification 3/4.3.3.7 and Table 3.3-10 of the Technical Specifications are proposed to be revised to reflect the installation of additional fire detection instrumentation in the Auxiliary Building and Containment. Action and Surveillance requirements for the instrumentation located in Containment have been added. Specific Surveillance Requirements for supervised and non-supervised instrumentation circuits have also been incorporated. These changes are consistent with the provisions of the Standard Technical Specifications (STS) for Combustion Engineering nuclear steam supply systems (NUREG-0212, Revision 2). The fire detection instrumentation was installed in accordance with the Fire Protection Safety Evaluation Report (SER) for Millstone Unit No. 2 transmitted with Reference (1). The need to add the fire detection instrumentation identified in Reference (1) to Table 3.3-10 was recognized from the guidance received in Reference (2). However, this submittal has been delayed awaiting the transmittal of revised STS for fire protection from the NRC Staff. Since the revised STS have not been published to date, NNECO has decided to submit this proposed change consistent with the current STS and with the guidance provided in Reference (3). It should be noted that References (4) and (5) submitted a proposed revision to Table 3.3-10 that involved a change from heat detectors to smoke detectors as requested by Reference (1). This proposed revision was subsequently approved by Reference (6).

The wording of Surveillance Requirement 4.7.9.1.3 pertaining to the diesel driven fire pump is revised to reflect the as-built design of the diesel starting system. This system utilizes two independent 12-volt batteries. The intent of the specification is not altered by the proposed wording change.

The list of spray and/or sprinkler systems in Specification 3.7.9.2 has been updated to reflect additions to the Plant fire protection systems.

Technical Specification 3/4.7.9.3, Fire Hose Stations, is revised, in part, to reflect provisions of the STS and the operability requirements for fire hose stations in Containment during operational MODES 5 and 6. Specifically, NNECO intends to locate fire hose station equipment outside Containment when in MODES 1-4. Table 3.7-2 has also been updated to include new hose stations added in accordance with the Millstone Unit No. 2 Fire Protection SER.

NNECO proposes to revise Technical Specification 3/4.7.10, Penetration Fire Barriers, to reflect the need to protect redundant safe shutdown related systems and equipment as required by Appendix R to 10CFR50. The Applicability Statement has been revised to account for different equipment requirements during various Plant operating MODES as specified in other portions of the Technical Specifications. The Action Statement for a non-functional fire barrier reflects the STS with slight modifications to the frequency of a fire watch patrol given an operable fire detection or suppression system on both sides of a non-functional fire barrier. In addition, a third provision is proposed for the Action Statement which requires a temporary fire barrier/penetration seal be installed for a period not to exceed thirty (30) days. If the barrier cannot be repaired within the specified time period, NNECO proposes to provide the Commission a special report outlining the cause of the barrier inoperability and the plans and schedules for restoring the barrier to functional status. A Special Report category is proposed to be added to Section 6.9.2.

NNECO also proposes to revise the Surveillance requirements for fire barrier penetration seals. The revised surveillance sample requirements take into account operating experience with penetration seal material and manufacturer's technical data on seal degradation over time. Operating experience and manufacturer's data indicate that there is no degradation with age and there are virtually no maintenance requirements for fire barrier penetration seals when properly installed. Plant design changes receive a fire protection review. This review specifically addresses the need to reinstate any new or existing fire barrier penetration seals as part of the work closeout requirements. This provision provides assurance that maintenance and construction work will not result in non-functional fire barriers. Semi-annual fire inspections conducted by American Nuclear Insurers, fire inspections by our in-house Fire Protection Engineering Section and monthly inspections conducted by Millstone Station Services personnel provide a random check of penetration seals above and beyond the proposed surveillance requirements of Specifications 4.7.10.b.

The proposed surveillance requirement of Specification 4.7.10.b is in concert with Technical Specifications approved by the Staff on another docket. The change would significantly reduce the resources expended to fulfill the inspection requirements of this Surveillance Requirement without detracting from the fire protection features at Millstone Unit No. 2.

NNECO has reviewed the attached proposed changes pursuant to 10CFR50.59 and has determined that they do not constitute an unreviewed safety question. Specifically, the discussions of each change above show the margins of safety as defined in the 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.

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed changes and has concluded that they do not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 50.92(c) are not compromised, a conclusion which is supported by our determination made pursuant to 10CFR50.59. The Commission has provided guidance concerning the application of the standards in 10CFR50.92 by providing certain examples (April 6, 1983, 48FR14870) of amendments that are considered not likely to involve significant hazards considerations. Example (i) relates to a purely administrative change to the technical specifications: For example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. Example (ii) relates to a change that constitutes an additional limitation, restriction or control not presently included in the technical specifications: For example, a more stringent surveillance requirement. Example (vi) relates to a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: For example, a change resulting from the application of a small refinement of a previously used calculational model or design method. The changes discussed above are similar to examples (i), (ii) or (vi) of 48FR14870 and thus do not involve a significant hazards consideration. The following is a detailed description of how each of the changes discussed above are similar to the examples of 48FR14870.

The changes to Technical Specification 3/4.3.3.7 are consistent with the STS as endorsed by Chapter 16 of the Standard Review Plan and, therefore, are similar to example (vi) of the guidance. The additional fire detection instrumentation included in Table 3.3-10 is similar to example (ii). The repagination of Technical Specification 3/4.3.3.8, Table 3.3-11 and Table 4.3-7 is editorial and is similar to example (i). The wording of Surveillance Requirement 4.7.9.1.3 is changed from a 24-volt battery to (2) 12-volt batteries to reflect the as-built battery design and, therefore, is similar to example (i). The change to Technical Specification 3/4.7.9.2 adds more spray and/or sprinkler systems and is similar to example (ii). Revisions to Technical Specification 3/4.7.9.3 are consistent with the STS as endorsed by Chapter 16 of the Standard Review Plan and, therefore, are similar to example (vi). Adding hose stations to Table 3.7-3 is similar to example (ii). The changes to Technical Specification 3/4.7.10 are consistent with Draft Revision 3 of the STS and are similar to changes approved by the NRC Staff on other dockets. The changes are within the acceptance criteria specified in the Standard Review Plan and, therefore, are similar to example (vi). The changes to Basis Section 3/4.7.10 reflects the revised wording of the Limiting Condition for Operation and the Surveillance Requirements of Penetration Fire Barriers and is similar to example (i). The addition to the reference specifications of Technical Specification 6.9.2 provides consistency throughout the Technical Specifications and is similar to example (i). Based on the above considerations, NNECO proposes to determine that these changes do not involve a significant hazards consideration.

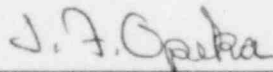
In accordance with 10CFR50.91(b), NNECO is providing the State of Connecticut with a copy of this proposed amendment.

The Millstone Unit No. 2 Nuclear Review Board has reviewed and approved this proposed amendment and has concurred with the above determinations. The Millstone Site Nuclear Review Board has reviewed and approved the proposed addition to Section 6.9.2.

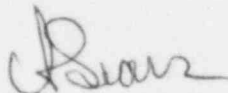
Pursuant to the requirements of 10CFR170.12(c), enclosed with this amendment request is the application fee of \$150.00.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President



By: C. F. Sears
Vice President

cc: Mr. Kevin McCarthy
Director, Radiation Control Unit
Department of Environmental Protection
State Office Building
Hartford, CT 06116

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

Then personally appeared before me C. F. Sears, who being duly sworn, did state that he is a 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 Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

James F. Rivers
Notary Public
My Commission Expires March 31, 1989