

**Northeast
Utilities System**

107 Seiden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

October 21, 1996

Docket No. 50-336
B15895

Re: Technical Specification 3.3.3.4

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

Millstone Nuclear Power Station, Unit No. 2
Special Report
Meteorological Instrumentation

This letter provides information required by Millstone Unit No. 2 Technical Specification 3.3.3.4 and constitutes the Special Report required by that Specification and Technical Specification 6.9.2.

The Unit 2 Technical Specification Table 3.3-8, "Meteorological Monitoring Instrumentation," indicates instrument minimum accuracy requirements for wind speed, wind direction, and air temperature. A review of these parameters by Northeast Nuclear Energy Company (NNECO) Design Engineering revealed that there is no calculation or analysis to support the accuracy requirements for the Meteorological Tower instrumentation in the Millstone Unit No. 2 Technical specifications; therefore the instrumentation was declared inoperable, based, in part, on the interpretation of accuracy given in NRC Regulatory Guide 1.23. Preliminary analysis indicates that the existing instrumentation can not meet all of the accuracy specifications, but nevertheless can perform its intended function. The instrumentation installed in the Meteorological Tower at Millstone is of high quality, with instrument accuracies that are satisfactory for the intended function of radiological assessment. The instrumentation is common to all Millstone units, but only Unit 2 has accuracy requirements in the Technical Specifications.

The provisions for meteorological monitoring were originally set forth in U.S. Atomic Energy Commission Safety Guide 23, "Onsite Meteorological Programs," issued February 17, 1972, and subsequently, NRC Regulatory Guide 1.23, "Meteorological Programs in Support of Nuclear Power Plants."

9610230153 961021
PDR ADOCK 05000336
P PDR

ADD 1/0

In brief, the function of the Meteorological Tower instrumentation is to provide meteorological information required to assess the radiological consequences of design basis accidents as well as routine releases of gaseous, radioactive effluents. Among other provisions, the Regulatory Guide delineates the type and accuracy of measuring instruments, as follows:

Wind Speed with accuracy for time averaged values of ± 0.5 mph (± 0.22 m/sec),

Wind direction with accuracy for instantaneous recorded values of $\pm 5^\circ$,

Temperature with accuracy for time averaged values of $\pm 0.5^\circ\text{C}$ ($\pm 0.9^\circ\text{F}$)

Temperature difference with accuracy of $\pm 0.1^\circ\text{C}$ ($\pm 0.18^\circ\text{F}$)

The provisions for wind speed, wind direction and differential temperature, with stated accuracies, are incorporated into the Millstone 2 Technical Specifications, Table 3.3-8. The Regulatory Guide provides no guidance on the intended meaning of the accuracy specifications. The proposed Revision 1 to Regulatory Guide 1.23 identifies the specifications as the composite accuracy of all components from sensor to final recorder or data reduction device derived from the square root of the sum of the squares of the individual errors.

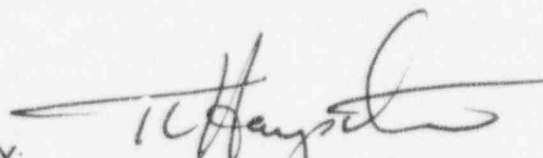
NNECO considers the accuracy requirements for meteorological instrumentation listed in Table 3.3-8 are inappropriate for inclusion in the Technical Specifications for Millstone Unit No.2. NNECO plans to amend the Technical Specifications to remove the accuracy requirements from the Millstone Unit No.2 Technical Specifications and provide for appropriate instrument accuracy in other administrative controls. Once the instrument table is removed from the Technical Specifications, it is NNECO's intent to revise the accuracy requirements to be consistent with current industry standards. Doing so will allow NNECO meteorological instrumentation to be operable.

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

Very truly yours,
NORTHEAST NUCLEAR ENERGY COMPANY

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

BY:



T. L. Harpster
Director, Nuclear Licensing

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