

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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July 9, 1985

Docket Nos. 50-213

50-245

50-336

B11596

Director of Nuclear Reactor Regulation

Attn: Mr. John A. Zwolinski, Chief
Operating Reactors Branch #5
Mr. Edward J. Butcher, Chief
Operating Reactors Branch #3

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Proposed Revisions to Technical Specifications
Administrative Controls - Facility Staff Overtime

Pursuant to 10CFR50.90 Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) hereby propose to amend their Operating Licenses DPR-61, DPR-21 and DPR-65, by incorporating the attached proposed changes into the Haddam Neck Plant, Millstone Unit No. 1 and Millstone Unit No. 2 Technical Specifications. These proposed changes would add to the existing Technical Specification 6.2.2, for each unit, a subparagraph 6.2.2.g for the purpose of formalizing control of overtime by station personnel.

The proposed Technical Specification changes are provided as Attachments 1, 2 and 3, for the Haddam Neck Plant and Millstone Unit Nos. 1 and 2, respectively. These proposed changes provide that administrative procedures be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures shall follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12)⁽¹⁾.

The issue of a Technical Specification to limit the use of overtime was first raised by the Staff in Generic Letter 82-16.⁽²⁾ The need for such Technical Specifications has since been discussed extensively between CYAPCO/NNECO and the NRC Staff. A comprehensive summary of CYAPCO and NNECO's

(1) D. G. Eisenhower letter to All Licensees of Operating Plants, dated June 15, 1982, transmitting Generic Letter 82-12.

(2) D. G. Eisenhower letter to All Pressurized Power Reactor Licensees, dated September 20, 1982.

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position on this matter was forwarded to the Staff on July 2, 1984⁽³⁾. The Staff responded to CYAPCO and NNECO on October 16, 1984,⁽⁴⁾ and requested that "suitable" Technical Specifications be proposed within 6 months. By letter dated November 9, 1984,⁽⁵⁾ CYAPCO and NNECO agreed to propose suitable Technical Specifications on the overtime issue. Subsequently, CYAPCO and NNECO informed the Staff that the proposed Technical Specifications would be submitted on or about June 30, 1985.⁽⁶⁾ This letter fulfills that commitment.

NNECO and CYAPCO have reviewed the attached proposed changes pursuant to 10CFR50.59 and have determined that they do not constitute an unreviewed safety question. Specifically, the margins of safety as defined in the Technical Specification Bases are maintained. In addition, the probability of occurrence or the consequences of previously analyzed accidents have not been increased and the possibility for a new type of accident not previously evaluated has not been created. These proposed changes add limitations, restrictions or controls not presently included in the Technical Specifications.

NNECO and CYAPCO have reviewed the proposed changes, in accordance with 10CFR50.92, and have concluded that they do not involve a significant hazards consideration. The basis for this conclusion is that the criteria of 10CFR50.92(c) are not compromised, a conclusion which is supported by our determinations made pursuant to 10CFR50.59. Additionally, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (48FR14870, April 1983). The proposed changes fall within the envelope of item (ii) of actions not likely to involve significant hazards consideration. Item (ii) states that a change that constitutes an additional limitation, restriction or control not presently included in the Technical Specifications, for example a more stringent surveillance requirement, would not likely constitute a significant hazard. These proposed changes outline and require administrative procedures to limit the working hours of unit staff who perform safety-related functions, thereby increasing the level of assurance that these functions will be performed properly.

The Millstone Site Nuclear Review Board and the Haddam Neck Plant Nuclear Review Board have reviewed and approved the attached proposed revisions and have concurred with the above determinations.

In accordance with 10CFR50.91(b) NNECO and CYAPCO are providing the State of Connecticut with a copies of these proposed amendments.

Pursuant to requirements of 10CFR170.12(c), enclosed with this amendment request is the application fee of \$450.00.

(3) W. G. Council letter to D. G. Eisenhut, dated July 2, 1984.

(4) J. R. Miller letter to W. G. Council, dated October 16, 1984.

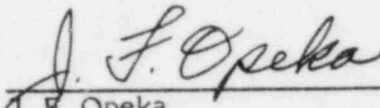
(5) W. G. Council letter to J. R. Miller, J. A. Zwolinski and B. J. Youngblood, dated November 9, 1984.

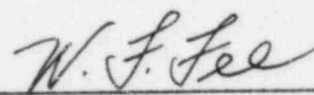
(6) J. F. Opeka letter to J. R. Miller, J. A. Zwolinski, dated May 24, 1985.

We trust you find this information satisfactory.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

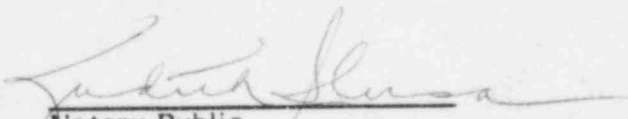

J. F. Opeka
Senior Vice President


By: W. F. Fee
Executive 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. F. Fee, who being duly sworn, did state that he is Executive Vice President of Connecticut Yankee Atomic Power Company and Northeast Nuclear Energy Company, Licensees 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.


Notary Public

Docket No. 50-213

Attachment 1

Haddam Neck Plant
Proposed Revision to Technical Specification

June 1985