

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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August 12, 1985

Docket Nos. 50-213

50-245

50-336

B11621

Director of Nuclear Reactor Regulation

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

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

- References: 1) T. T. Martin letter to W. G. Counsil, dated August 1, 1984 transmitting I&E Inspection Report Nos. 50-245/84-15 and 50-336/84-15.
- 2) W. G. Counsil letter to Dr. T. E. Murley, dated August 30, 1984.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1 and 2
Proposed Revision to Technical Specifications
Fire Protection and Loss Prevention Program Audits

Pursuant to 10CFR50.90, Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) hereby propose to amend their Operating Licenses, Nos. DPR-61, DPR-21, and DPR-65 for the Haddam Neck Plant and for Millstone Nuclear Power Station, Unit Nos. 1 and 2, respectively, by incorporating the attached changes into the plant Technical Specifications. The proposed changes revise Technical Specification Section 6.5.2.7.i for Haddam Neck and Section 6.5.4.7.e for Millstone Unit Nos. 1 and 2, "Fire Protection and Loss Prevention Program Audits" and clarify the term "outside firm" in the present Technical Specifications.

I&E Inspection Report Nos. 50-245/84-15 and 50-336/84-15 transmitted by Reference (1) expressed a concern that the relationship between the auditors and those audited may not meet the wording of the present Technical Specification requirement that an outside firm perform the annual fire protection and loss prevention program audits. NNECO responded to this concern by Reference (2) which stated our long-standing position that the Generation Fire Protection Engineering Group within Northeast Utilities (NU) qualifies as an outside firm and that this position was previously determined by the NRC Staff to be consistent with the language and intent of the current Technical Specification. However, in recent discussions with the Region I Staff, we were requested to

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either clarify the current Technical Specification term "outside firm" by submitting a proposed Technical Specification change or commence contracting with a firm independent of NU. The purpose of the proposed Technical Specification changes is to resolve this open item.

CYAPCO and NNECO have reviewed the attached proposed changes pursuant to the requirements of 10CFR50.59 and have determined that they do not constitute an unreviewed safety question. The basis for this determination is that the proposed changes are purely administrative, do not increase the probability or consequences of any accident previously evaluated in the plant safety analysis reports, do not create the possibility of an accident or malfunction of a different type than previously evaluated in the safety analysis reports, and do not reduce the margin of safety as defined in the basis for any Technical Specification. The proposed changes more clearly indicate that our current practice in performing fire protection and loss prevention program audits is acceptable.

In accordance with 10CFR50.92, CYAPCO and NNECO have reviewed the attached proposed changes and have 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 Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. The changes discussed above provide a change in nomenclature and thus are similar to example (i) of 48FR14870. Based on the above considerations, CYAPCO and NNECO have determined that the changes do not involve a significant hazards consideration.

In accordance with the requirements of 10CFR50.91(b), a copy of this document is being provided to the State of Connecticut.

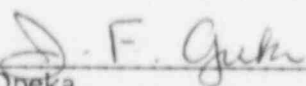
The Connecticut Yankee Nuclear Review Board and the Millstone Site Nuclear Review Board have reviewed and approved the proposed amendments and have concurred with the above determinations.

Pursuant to the requirements of 10CFR170.12(c), enclosed with this amendment request is the application fee of \$150.00 for each plant for a total of \$450.00.

A copy of this proposed change is also being sent directly to Region I to confirm that their concern is addressed by this change.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



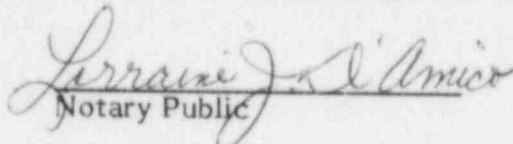
J. F. Opeka
Senior Vice President

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

Dr. Thomas E. Murley
Regional Administrator
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

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

Then personally appeared before me J. F. Opeka, who being duly sworn, did state that he is a Senior Vice President of Northeast Nuclear Energy Company and Connecticut Yankee Atomic Power 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

My Commission Expires March 31, 1988