



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 100

TO FACILITY OPERATING LICENSE NO. DPR-21

NORTHEAST NUCLEAR ENERGY COMPANY

MILLSTONE NUCLEAR POWER STATION, UNIT 1

DOCKET NO. 50-245

1.0 INTRODUCTION

By letter dated September 5, 1996, the Northeast Nuclear Energy Company (NNECO) submitted a request for changes to the Millstone Nuclear Power Station, Unit 1, License Conditions. The requested changes would delete License Condition 2.C.(5), "Integrated Implementation Schedule" from the Millstone Unit 1 Operating License.

2.0 BACKGROUND

The original purpose of License Condition 2.C.(5) was to provide an administrative process for NNECO to schedule and implement NRC and NNECO initiated plant modifications and engineering studies on an integrated basis. For example, this program was used by the licensee for the prioritization of modifications and studies associated with the Systematic Evaluation Program (SEP) and implementation of the Three Mile Island (TMI) modifications. However, the licensee notes that there have been relatively few new topics initiated within the past few years. Therefore, the need for the Integrated Implementation Schedule has diminished and the licensee has requested the deletion of this license condition.

The NRC's policy on integrated schedules was published on September 23, 1992 (57 FR 43886) and made effective on November 23, 1992. As noted in the policy statement, the Commission encourages nuclear power plant licensees to voluntarily implement integrated schedules for regulatory requirements and other activities. However, the policy explicitly states that "Licensees may withdraw from the program upon notifying the NRC."

3.0 EVALUATION

The proposed license amendment removes an administrative requirement relating to scheduling and implementing NRC and licensee initiated plant modifications and engineering studies. Because it is only an administrative scheduling tool, it does not directly affect plant design or operation. It can indirectly affect plant design or operation by affecting the implementation schedules of safety significant plant modifications or studies. However, the

deletion of the licensee condition will not remove the licensee's responsibility for scheduling these activities. Instead of the Integrated Implementation Schedule methodology which allowed the licensee to schedule NRC initiated and self-initiated items in an integrated fashion, the licensee "intends to utilize prioritization models which reflect nuclear safety and cost-benefit analysis for unit-initiated topics and will continue to work with the NRC staff on staff identified topics." Thus, under the proposed amendment, NRC initiated plant modifications and engineering studies will no longer be part of the licensee's internal scheduling system and will instead be discussed with the NRC staff. The licensee's request to withdraw from this program is consistent with NRC's policy to allow licensees to withdraw from this voluntary program. Therefore, the proposed deletion of License Condition 2.C.(5) is acceptable.

In its September 5, 1996, submittal, the licensee listed items from the Integrated Implementation Schedule that have not yet been closed out. The licensee listed planned closeout dates for each of these items. The staff did not base its above evaluation on the licensee's commitments to closeout these items within the schedules indicated. During the current extended shutdown, the licensee has made numerous commitments to the staff regarding a wide range of topics. The staff will consider the licensee's commitments listed in its September 5, 1996, submittal along with the licensee's other commitments to the staff. If necessary, to ensure timely completion of these commitments, the staff will issue a Confirmatory Action Letter or an Order at a future date.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: S. Dembek

Date: April 15, 1997