

failure. The proposed changes to the action requirements will not change the response of the DGs to an LNP. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The requirement contained in the second footnote (\*\*) to Technical Specification 3.8.1.1 to allow a one time extension of the allowed outage time to 7 days will be deleted. This provision is no longer necessary since the Millstone Unit No. 1 work has been completed. The statements that a successful test of the DG performed for the current Action Statements c, d, or e will satisfy the required testing of Action States a or b are no longer necessary with the proposed changes. These statements will be deleted. The removal of these items will not change the response of the DGs to an LNP. Therefore, these proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The proposed changes to the DG surveillance requirements will allow an engine prelude period before all DG tests starts, allow slow starting of the DGs, and allow the DGs to be loaded in accordance with manufacturer recommendations. This will decrease the wear on the DGs. The proposed changes will also allow adequate time for the completion of all manufacturer recommended DG engine prelude procedures. Modifying starting and loading requirements, consistent with the manufacturer recommendations, is intended to enhance diesel reliability by minimizing severe test conditions which can lead to premature failures. In addition, specifying that the 184 day DG SRs [surveillance requirements] will satisfy the 31 day DG starting and loading SRs will eliminate redundant testing. These proposed changes will minimize unnecessary DG testing while maintaining DG reliability. The proposed changes will not change the response of the DGs to an LNP. Therefore, these changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The ASTM [American Society for Testing and Materials] standards referenced for diesel fuel oil sampling will be modified in SR 4.8.1.1.2.b. The proposed changes will replace an outdated standard, and will remove the year of issuance or revision from the ASTM standards referenced. This will allow use of the current approved ASTM standard. These proposed changes do not affect the sampling frequency or acceptance criteria of this SR. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The proposed wording changes to eliminate any possible confusion when SRs 4.8.1.1.1 and 4.8.1.1.2 are referenced by SR 4.8.1.2, to state that the DGs start from standby conditions instead of ambient conditions, and to remove the requirement to perform a DG surveillance only during shutdown will not affect any technical aspect of the SRs. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

SRs will be added to test the DGs every 184 days at conditions similar to the current 31 day SRs. These conditions are more restrictive than the new proposed 31 day SRs. The 184 day SRs will require the diesel generators to start and obtain speed and voltage within 15 seconds and will also require the diesel generators to be synchronized, loaded, and to maintain the load for at least 60 minutes. However, it will allow gradual loading, based on manufacturer recommendations, to be used. A 184 day surveillance interval is sufficient to verify DG fast-start capability, and is consistent with GL [Generic Letter] 84-15, GL 93-05, and NUREG-1432. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The list of SRs, contained in SR 4.8.1.2, that do not have to be performed for the operable diesel generator in Modes 5 and 6 will be expanded to take into account the 184 day DG SR that will be added. This proposed change will exclude the one operable DG from being loaded when the 184 day SR is performed. This is consistent with the current SR which excludes performance of SR 4.8.1.1.2.a.3. Loading the one required operable diesel generator could subject this diesel generator to grid faults which could adversely affect its ability to perform its safety function. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously analyzed.

The Bases of these Technical Specifications will be modified and expanded to discuss the proposed changes, and to provide guidance to ensure the requirements are correctly applied. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously analyzed.

These proposed changes do not alter the way any structure, system, or component functions. The intent of the proposed changes is to improve the reliability of the DGs by eliminating unnecessary surveillance testing and allowing most of the surveillance testing to be performed in accordance with the recommendations of the manufacturer. There will be no adverse effect on equipment important to safety. The response of the DGs to an LNP, as described in the Millstone Unit No. 2 FSAR [Final Safety Analysis Report], will remain the same. There will be no effect on any of the design basis accidents previously evaluated. Therefore, this License Amendment Request will not result in a significance increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of an accident from any accident previously evaluated.

The proposed changes do not alter the plant configuration (no new or different type of equipment will be installed) or require any new or unusual operator actions. They do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated. The proposed changes do not introduce any new failure modes. Therefore, the proposed

changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in the margin of safety.

This License Amendment Request proposes to modify the LCOs for electrical power sources, DG surveillance requirements and the required actions for inoperable electrical power sources contained in the Millstone Unit No. 2 Technical Specifications. The proposed changes will revise LCO wording to be consistent with the required offsite power distribution requirements and improve DG reliability by minimizing excessive wear of the DGs, and changing the starting and loading requirements of the DGs, in accordance with manufacturer recommendations, during most DG surveillance and operability tests. Improving the reliability of the DGs will help ensure the DGs will respond to an LNP as described in the Millstone Unit No. 2 FSAR. Therefore, this License Amendment Request will not result in a significant reduction in the margin of safety as defined in the Bases for the Technical Specifications addressed by the proposed changes.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Local Public Document Room location:* Learning Resources Center, Three Rivers Community-Technical College, 574 New London Turnpike, Norwich, Connecticut, and the Waterford Library, ATTN: Vince Juliano, 49 Rope Ferry Road, Waterford, Connecticut.

*Attorney for licensee:* Lillian M. Cuoco, Esq., Senior Nuclear Counsel, Northeast Utilities Service Company, P.O. Box 270, Hartford, Connecticut.

*NRC Deputy Director:* Phillip F. McKee.

*Northeast Nuclear Energy Company, et al., Docket No. 50-336, Millstone Nuclear Power Station, Unit No. 2, New London County, Connecticut*

*Date of amendment request:* July 21, 1998.

*Description of amendment request:* The proposed amendment would change the Technical Specifications (TS) by changing various Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) setpoints and allowable values; correct the specified maximum reactor power level limited by the high power level RPS trip; add new TS and requirements associated with the automatic isolation of steam generator blowdown; and make several editorial and changes to correct various errors

and to provide needed clarification. The applicable TS Bases sections would also be changed to reflect the proposed changes, correct previous errors identified during the licensee's review of the TS, eliminate redundant information, and expand the TS Bases to discuss the new requirements for the automatic isolation of the steam generator blowdown.

Specifically, the proposed changes would modify TS 2.1.1, "Safety Limits—Reactor Core," TS 2.2.1, "Limiting Safety System Settings—Reactor Trip Setpoints," TS 3.3.1.1, "Instrumentation—Reactor Protective Instrumentation" TS 3.3.2.1, "Instrumentation—Engineered Safety Features Actuation System Instrumentation," and would add a new TS 3.7.1.8, "Plant Systems—Steam Generator Blowdown Isolation Valves." As previously noted, the applicable TS Bases sections will be updated to reflect the proposed changes.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to correct the maximum reactor power level from 112% to 111.6% is consistent with the maximum high power trip setpoint of 106.6%, plus 5% uncertainty, currently used in the safety analyses. This does not change the Technical Specification required high power reactor trip setpoint. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to the trip setpoints and allowable values for the Reactor Protection System (RPS) trips on high pressurizer pressure, high containment pressure, low steam generator pressure, and low steam generator level are the result of revisions to the instrument loop uncertainty and setpoint calculations. These calculations were revised to incorporate calculation methodology changes, analytical limit changes, correct errors identified, and to include the effects of a harsh environment (pressure, temperature, and radiation), where appropriate. The proposed setpoints and allowable values will ensure a reactor trip signal is generated at, or before the analytical limits used in the respective accident analyses are reached. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to the trip setpoints and allowable values for the Engineered Safety Features Actuation System (ESFAS) actuations on low pressurizer pressure, high containment pressure, low steam generator pressure, low refueling water storage tank level, and low steam generator level are the result of revisions to the instrument loop uncertainty and setpoint calculations. These changes were revised to incorporate calculation methodology changes, analytical limit changes, correct errors identified, and to include the effects of a harsh environment (pressure, temperature, and radiation), where appropriate. The proposed setpoints and allowable values will ensure an ESF [engineered safety feature] actuation signal is generated at, or before the analytical limits used in the respective accident analyses are reached. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to add Technical Specification requirements for the steam generator blowdown isolation valves will provide additional assurance that the automatic isolation of steam generator blowdown will occur as assumed in the loss of main feedwater accident analysis. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to the value of steam generator pressure when the steam generator low pressure reactor trip can be bypassed (from 780 psia to 800 psia) will reduce the range of plant operation when this trip is required to be available. However, this will not affect the range of plant operation when this RPS trip is required to be operable. This RPS trip is required in Modes 1 and 2. The expected steam generator pressure during a reactor startup (entry into Mode 2) is approximately 900 psia, which corresponds to a Reactor Coolant System (RCS) temperature of approximately 532°F. The proposed change will require the bypass to be automatically removed prior to exceeding a steam generator pressure of 800 psia. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to the value of pressurizer pressure (from 1750 psia to 1850 psia) when the pressurizer low pressure ESF actuations (SIAS, CIAS, and EBFAS) [safety injection actuation system, containment isolation actuation system, and enclosure building filtration actuation system] can be blocked will reduce the range of plant operation when these functions are required to be available. However, since the plant would normally be in Mode 3 when pressurizer pressure is in this range,

automatic actuation of these ESF functions on high containment pressure, as well as manual actuation, is required to be operable. In addition, the plant would not normally maintain pressurizer pressure between 1750 psia and 1850 psia. Therefore, since automatic actuation of these ESF functions on high containment pressure, as well as manual actuation, should be operable, and the time the plant will operate between 1750 psia and 1850 psia is small, the ESFAS will continue to function as before. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to the value of steam generator pressure (from 600 psia to 700 psia) when the steam generator low pressure ESF actuation (main steam line isolation) can be blocked will reduce the range of plant operation when this function is required to be available. However, since the plant would be in Mode 3 when steam generator pressure is in this range (RCS temperature of approximately 486°F to 503°F), automatic actuation of this ESF function on high containment pressure, as well as manual actuation, is required to be operable. In addition, the plant would not normally maintain steam generator pressure between 600 psia and 700 psia. Therefore, since automatic actuation of this ESF function on high containment pressure, as well as manual actuation, should be operable, and the time the plant will operate between 600 psia and 700 psia is small, the ESFAS will continue to function as before. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The minor editorial and non-technical changes to correct spelling errors, correct a capitalization error, add page amendment numbers, add the specific plant parameter (steam generator pressure) to use if an RPS or ESF function can be bypassed, change the value of the parameter (pressurizer pressure) used in action statements, and a "[less than or equal to]" symbol, change "value" to "setpoint," and update the index will have no effect on plant operation. These changes will not result in any technical changes to the Millstone Unit No. 2 Technical Specifications. There will be no adverse effect on any design basis accident previously evaluated or on any equipment important to safety. Therefore, the proposed change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes to the Technical Specification Bases will incorporate the RPS and ESFAS setpoint changes, correct errors, eliminate redundant information, and expand the Bases to discuss the new requirements for steam generator blowdown isolation. These changes will have no effect on equipment operation. There will be no adverse effect on any design basis accident