involve an SHC because the changes would not:

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

This change to LCO [Limiting Condition for Operation] 3.5.F.7(e) will allow an alternative means of de-energizing power to the selected ECCS pump motors during refueling. The current

technical specification already allows these motors to be de-energized. Use of the pullto-lock switches provides a safer method of achieving this condition. The pull-to-lock condition of the switches is annunciated in the control room. Therefore, the switches will not be inadvertently left in the pull-tolock position.

Deletion of the statement that the 4160 volt supply breakers are racked in does not affect the requirement of LCO 3.5.F.7 to ensure the specified ECCS subsystems are OPERABLE.

Therefore, there is no change in the probability or consequences of an accident previously analyzed due to this change.

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

The use of an alternative means of deenergizing power from the selected ECCS pump motors does not create a possibility of a new or different kind of accident. Using the control room pull-to-lock switch to disable the pump motor circuit breaker has the same effect on the ECCS pump as the removal of the circuit breaker from the switchgear.

Deletion of the statement that the 4160 volt supply breakers are racked in does not affect the requirement of LCO 3.5.F.7 to ensure the specified ECCS subsystems are OPERABLE.

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

The proposed change to the Millstone Unit No. 1 Technical Specifications does not reduce the margin of safety. By using the control room pull-to-lock switches to disable the ECCS pump motors, instead of racking out the pump motor circuit breakers, it is possible to reenergize the ECCS pumps more quickly in an emergency, should one occur. The time savings can be translated into added safety margin from a shutdown risk perspective. The ability to disable and enable the pumps from the control room, instead of the switchgear area, also contributes to this added safety margin.

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, CT 06360.

Attorney for licensee: Ms. L. M. Cuoco, Senior Nuclear Counsel, Northeast Utilities Service Company, Post Office Box 270, Hartford, CT 06141-0270. *NRC Project Director:* Phillip F. McKee

Northeast Nuclear Energy Company (NNECO), Docket No. 50-245, Millstone Nuclear Power Station, Unit 1, New London County, Connecticut

Date of amendment request: July 18, 1995

Description of amendment request: The proposed amendment request will add operability and surveillance requirements for reactor pressure vessel (RPV) overfill protection instrumentation. The proposed amendment will also add the associated Bases.

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:

NNECO has reviewed the proposed change in accordance with 10 CFR 50.92 and concluded that the change does not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10 CFR 50.92(c) are not compromised. The proposed change does not involve an SHC because the change would not:

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

The new LCO [Limiting Condition for Operation] and surveillance requirements ensure that the reactor high water level feedwater pump trip instrumentation is available. This technical specification change does not involve the addition of new equipment or logic. This change does not add new surveillance requirements for the instrumentation. This change simply establishes requirements for the operation and surveillance of

reactor high water level feedwater pump trip instrumentation in the technical specifications. The implementation of this technical specification change will decrease the likelihood of an RPV overfill. No other postulated event is affected by the addition of this instrumentation to the technical specifications.

Thus, adding the proposed requirements to the technical specifications will not increase the probability or consequences of any previously evaluated transients or accidents.

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

No new failure modes are introduced by the addition of the reactor high water level feedwater pump trip instrumentation LCO and surveillance requirements. Modifying the technical specifications to formally add surveillance requirements already being performed in accordance with plant procedures will not modify plant response to any operational or transient event. Increasing the surveillance interval of the LITS [level indicating transmitter switches] from annual to once per operating cycle will not significantly affect reliability. Ensuring the operability of installed instrumentation does not add new or different kinds of accidents.

Therefore, the new LCO and surveillance requirements do not create the possibility of a new or different kind of accident.

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

The surveillance requirements being added in this change are consistent with current surveillances being performed for this instrumentation, with the exception that the LITS are currently calibrated on an annual rather than operating cycle basis. These surveillance and shutdown requirements ensure that protection from RPV overfill is maintained as assumed in the safety analyses.

Therefore, there is no impact on the margin of safety.

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, CT 06360.

Attorney for licensee: Ms. L. M. Cuoco, Senior Nuclear Counsel, Northeast Utilities Service Company, Post Office Box 270, Hartford, CT 06141-0270.

NRC Project 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 7, 1995

Description of amendment request: The proposed change to technical specification 3/4.7.6 is being made to: 1) increase the allowable control room air conditioning (CRAC) system in-leakage from 100 cubic feet per minute (cfm) to 130 cfm; 2) provide a more conservative value for the maximum differential pressure across the high efficiency particulate air (HEPA) filters and charcoal adsorbers; 3) clarify that when the CRAC system is shifted to "recirculation," this will be performed from the normal mode; and $\overline{4}$) modify the corresponding basis to reflect the above changes and to note that there are certain infrequent situations during which the control room emergency ventilation system (CREVS) will not automatically operate.

Basis for proposed no significant hazards consideration determination: As