In accordance with 10 CFR 50.92, NNECO has reviewed the proposed changes and has concluded that they do not involve an SHC. The basis for this conclusion is that the three criteria of 10 CFR 50.92(c) are not compromised. The proposed changes do not involve an SHC because the change would not:

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

The proposed change to Surveillance Requirement 4.8.1.1.1 is being made because presently, the surveillance requirement for demonstrating offsite sources are operable states that "two" independent circuits are required. The surveillance requirement is referenced for both operating and shutdown modes. While it is accurate for operating modes, it is inconsistent with the limiting condition for operation for shutdown. The proposed change is safe because it renders the surveillance requirement consistent with the applicable limiting condition for operation (i.e., operating or shutdown) and eliminates a potential source of confusion.

The change to Surveillance Requirement 4.8.1.2 and Technical Specification 3.8.2.2 merely clarifies the diesel generator surveillance and operability requirements for Modes 5 and 6 and renders action statements for related technical specification sections consistent with and appropriate for operational Modes 5 and 6.

Regarding diesel generator surveillance requirements, automatic A.C. power for LNP events in Modes 5 and 6 is not required. This is validated by the fact that the undervoltage sensors are only required to be operable in Modes 1, 2 and 3 to meet technical specifications. Because the undervoltage sensors provide the logic that results in actuation of the sequencer, it follows that the sequencer need not be operable in Modes 5 and 6. Accordingly, the sequencer is not required to support operability of the available diesel generator in Modes 5 and 6. Further, because SIAS is blocked in Modes 5 and 6, automatic start of the diesel generator upon receipt of a SIAS is similarly not required to support operability of the diesel generator in Modes 5 and 6.

Additionally, operation of the diesel generator in parallel with the system during Modes 5 and 6 is not required to perform its intended safety function. In fact, such operation may compromise both sources as the result of a single event.

Since automatic A.C. power is not credited in the mitigation of Mode 5 and 6 events and accidents, such as fuel handling accidents, there is no increase in the probability or consequences of previously evaluated accidents.

The action statement in Technical Specification 3.8.2.2 has been revised to cite actions that are more appropriate for Modes 5 and 6 for Millstone Unit No. 2. This is due to the ability to maintain the plant in a safe condition without needing to automatically load the diesel generator through the sequencers in Modes 5 and 6. In addition, the proposed change is consistent with the CE Owner's Group Standard Technical Specification and with other Millstone Unit No. 2 action statements. Consequently, there is no increase in the probability or consequences of previously evaluated accidents.

The change to TS 3.8.2.4 merely renders the action statement consistent with, and appropriate for, operational Modes 5 and 6.

Since D.C. power is not credited in the mitigation of Mode 5 and 6 events and accidents, such as fuel handling accidents, there is no increase in the probability or consequences of previously evaluated accidents.

The action statement in TS 3.8.2.4 has been revised to cite actions that are more appropriate for Modes 5 and 6 for Millstone Unit No. 2. This is due to the ability to maintain the plant in a safe condition without D.C. power distribution available in Modes 5 and 6. In addition, the proposed change is consistent with the CE Owner's Group Standard Technical

Specifications (NUREG–1432) and with other Millstone Unit No. 2 action statements. Consequently, there is no increase in the probability or consequences of previously evaluated accidents.

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

The proposed changes do not alter or affect the design, function, failure mode, or operation of the plant. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed changes to the technical specifications provides greater consistency between the action statements and clarifies which surveillance requirements are required in Modes 5 and 6. Since the diesel generators are not required to be loaded automatically in Modes 5 and 6, and since it is part of our shutdown risk management program to assure that adequate cooling is able to be provided, and since the diesel will still be verified to start and achieve rated speed, the proposed changes to the technical specifications do not reduce the margin of safety.

The proposed change to the TS provides greater consistency among action statements during Modes 5 and 6. Since the D.C. distribution system is not credited in the mitigation of Mode 5 and 6 events and accidents, and since it is part of our shutdown risk management program to assure that adequate fuel cooling is able to be provided, the proposed change to the TS does not reduce 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: Lillian M. Cuoco, Esq., Senior Nuclear Counsel, Northeast Utilities Service Company, P.O. Box 270, Hartford, CT 06141–0270.

*NRC Project Director:* Phillip F. McKee

Northeast Nuclear Energy Company, et al., Docket No. 50–423, Millstone Nuclear Power Station, Unit No. 3, New London County, Connecticut

*Date of amendment request:* June 27, 1995, as supplemented July 21, 1995

Description of amendment request: The amendment revises the Technical Specifications (TS) to relocate TS requirements for the containment purge exhaust and supply valves, and to remove a duplicate testing requirement for the safety injection input from engineered safety features from the TS.

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:

... The proposed changes do not involve an SHC [significant hazards consideration] because the changes would not:

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

The first proposed change relocates the operability and surveillance requirements for the containment high range radiation monitors from Technical Specification Section 3.3.3 to Technical Specification Section 3.3.2. The proposed changes are administrative in nature. The proposed changes do not alter the way any structure, system, or component functions and do not modify the manner in which the plant is operated and do not involve any physical changes to the plant.

The second proposed modification will delete the testing requirement for functional unit 16, "Safety Injection Input from ESF," of Table 4.3–1 because the logic circuitry that processes

the safety injection signals and produces a reactor trip is tested under functional unit 19 'Automatic Trip and Interlock Logic," and the testing is performed on a more frequent basis (i.e., on a monthly staggered bases versus on an 18-month frequency). In addition, the same logic testing is accomplished with an 18-month TADOT of functional unit 1.a of Table 4.3-2 and with a monthly staggered actuation logic testing of functional unit 16 of Table 4.3-2. This testing ensures that operability of the logic under functional unit 16 of Table 4.3-1 is verified. The other tests will continue to verify the operability of the reactor trip system and that a reactor trip will be initiated when required.

Therefore, there is no change in the potential for an increase in the consequences of an accident previously analyzed.

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