

Containment Isolation Valve] indication are consistent with the proposed required ACTIONS. Position indication will still be required for each operable PCIV and penetrations without adequate PCIV indication status will be isolated, thus assuring containment integrity in the event of an accident. Deletion of the "Minimum Required Actions" column in Table 3.3.7.5-1 is consistent with the proposed ACTIONS for LCO 3.3.7.5, since compensatory actions are based on compliance with the "Required Number of Channels." Deleting the "Applicable Operating Conditions" column is consistent with the proposed changes and other NMP2 Technical Specifications sections. Finally, referencing Specification 4.0.5 is an administrative change which does not alter any existing surveillance requirements for the safety relief valves.

In aggregate, the proposed changes do not affect the plant in a way that could directly contribute to causing or mitigating the effects of an accident. Therefore, the operation of NMP2, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The operation of NMP2, in accordance with the proposed amendment, will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not represent a physical change to the plant as described in the NMP2 USAR [Updated Safety Analysis Report]. The proposed changes do not modify any plant equipment and the initial conditions used for the design basis accident analysis are still valid. Thus, no potential initiating events are created which would cause any new or different kinds of accidents. PAM instrumentation is used to guide operator response during postulated accidents. Those PAM instruments considered of controlling importance to safety are retained in the Technical Specifications. Thus, plant response to previously analyzed events is not altered so as to create any new or different kinds of accidents. Therefore, operation of Nine Mile Point Unit 2 in accordance with the proposed change will not create the possibility of a new or different kind of accident from any previously assessed.

The operation of NMP2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

The non-Category 1 PAM instruments being removed from the Technical Specifications do not meet any of the Commission's screening criteria. That is, the instruments being proposed for removal are not of controlling importance to safety or necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. Thus, they are not critical to any margin of safety.

PAM instruments are related to the diagnosis and preplanned actions required to mitigate DBAs assumed to occur in Operational Conditions 1 and 2. A DBA during Operational Condition 3 is extremely unlikely. The requirement to maintain the Reactor Water Level, Suppression Pool Water Level and Drywell High Range Radiation Monitor instrumentation operable in Operational Condition 3 will be deleted. Because Suppression Pool Water Level indication will no longer be required in Operational Condition 3, its ACTION requirement was revised to delete the requirement to place the plant in COLD SHUTDOWN, Operational Condition 4. This is consistent with the ITS, which requires that the plant be brought to an operational condition in which the LCO does not apply if a required action cannot be met. Therefore, deleting the requirement that PAM instruments be operable during Operational Condition 3 and changing the ACTION requirement for Suppression Pool Water Level Monitoring does not significantly reduce a margin of safety.

Since the Category 1 PAM instruments are passive in nature (i.e., no critical automatic action is assumed to occur from these instruments) and alternate means exist to obtain the required information, an acceptable level of safety is assured when instrument channels are out of service. Also, the probability of an event requiring PAM instrumentation is low. Continued operation with one channel out of service, and limited plant operation with two channels out of service, does not compromise plant safety margins. An acceptable level of safety is maintained during plant startups and operation with instrument channels out of service. Thus, the proposed changes to the required ACTIONS and the proposed exemption to Specification 3.0.4 will not significantly reduce a margin of safety.

The proposed changes to PCIV indication will assure correct implementation of the ACTIONS discussed above. Isolating the flow path associated with one or two inoperable PCIV indication channels is

conservative since the subject valve will be positioned as required to assure primary containment integrity. The remaining editorial changes are administrative in nature and by definition do not affect safety margins. Deleting the "Minimum Operable Channels" and "Applicable Operating Conditions" columns is consistent with the proposed changes. Finally, referencing the requirements of Specification 4.0.5 is an administrative change and by definition does not reduce the margin of safety.

Therefore, the operation of NMP2 in accordance with the proposed change will not involve a significant reduction in a margin of safety.

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

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*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:* December 9, 1994.

*Description of amendment request:* The proposed changes incorporate NRC recommendations contained in Generic Letter 93-05 related to the diesel generator (DG) surveillance requirements and other DG surveillance requirements related to the cold starts. The proposed changes to the DG operability testing surveillance requirements are consistent with the intent of GL 93-05 however vary in some particulars, because of circumstances specific to Millstone 3. The proposed changes will modify the requirement for the DG operability testing when the other DG is inoperable, delete the requirement for DG operability testing when one or both offsite AC sources are inoperable, eliminate fast loading of DGs except for the 18-month test, and modify the hot restart test from the 24-hour loaded test run for the DGs.

*Basis for proposed no significant hazards consideration determination:*