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Millstone Nuclear Power Station Northeast Nuclear Energy Company P.O. Box 128 Waterford, CT 06385-0128 (860) 447-1791 Fax (860) 444-4277

The Northeast Utilities System

MAY - 2 2000

<u>Docket No. 50-423</u> <u>B18108</u>

Re: 10 CFR 50.90

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 3
Supplemental Information Related to Implementation of Proposed
Technical Specification Changes Currently Under NRC Review

By letters dated January 18, 1999⁽¹⁾ and November 29, 1999⁽²⁾ respectively, Northeast Nuclear Energy Company (NNECO), submitted proposed revisions to the Millstone Unit No. 3 Technical Specifications and Licensing Basis in support of 1) redefining a full core off-load during refueling as a normal evolution, and 2) adopting the recommendations of the Nuclear Regulatory Commission (NRC) Generic Letter 99-02 relating to testing methods applicable to nuclear grade charcoal filtration media. The information contained in this submittal supercedes and/or supplements information contained in the referenced submittals related to NNECO's requested implementation schedules for the associated changes.

In Reference 1, NNECO requested that the amendment be issued by May 15, 1999, in support of the sixth refueling outage for Unit No. 3. Given the complex nature of this application and the short lead time, the NRC Staff was unable to support that request. NNECO subsequently prepared a Safety Evaluation in accordance with the provisions of 10 CFR 50.59, to justify conducting a full core off-load in support of the outage. NNECO hereby requests that the license amendment be made effective upon issuance with a 90 day period for implementation by NNECO. The 90 day period is necessary as

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M. L. Bowling letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3 - License Amendment Request and Technical Specification Changes For Full Core Off-load (PTSCR 3-16-98)," dated January 18, 1999.

⁽²⁾ R. P. Necci letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3 - Proposed Revision to Technical Specifications, Response to Generic Letter 99-02 "Laboratory Testing of Nuclear-Grade Activated Charcoal" and Preparation of Technical Specifications Change Request 3-12-99," dated November 29, 1999.

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significant human resources have been diverted to support the refueling outage which is presently underway at Millstone Unit No. 2. A 90 day period for implementation will allow NNECO to maintain its focus on the safe conclusion of the outage and still provide sufficient time to implement the Amendment.

In Reference 2, NNECO submitted changes to the Technical Specifications adopting revised test standards to be applied in demonstrating the OPERABILITY of nuclear grade ventilation system charcoal filtration media. In addition to the Technical Specification changes, NNECO committed to implement these revised testing standards for all future testing of nuclear grade charcoal filtration media. referenced submittal, NNECO requested that the Amendment, when issued, be effective immediately with a 60 day implementation period. NNECO hereby requests that the implementation period correspond to 60 days following completion of initial testing of the affected filters. Testing is being conducted in accordance with current Technical Specification surveillance testing schedules and is expected to be complete by the end of the first quarter of 2001. This change in implementation schedule is necessary to ensure that required testing and associated corrective actions, if necessary, are completed in advance of a change in the OPERABILTY requirements for the affected equipment.

There are no regulatory commitments contained within this letter.

If you have any questions or comments regarding this submittal, please contact Mr. David W. Dodson at (860) 447-1791, ext. 2346.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Raymond P. Necci

Vice President - Nuclear Technical Services

Subscribed and sworn to before me

Date Commission Expires: Nov 30,0001

See next page CC:

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cc: H. J. Miller, Region I Administrator

V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3 A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

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