Northeast Nuclear Energy

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The Northeast Utilities System

AUG 31 2000

Docket No. 50-423
B18208

Re: 10 CFR 50.90

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

Millstone Nuclear Power Station, Unit No. 3
Modification to Proposed Revision to Technical Specifications TSCR 3-05-00
Performance Based Containment Leakage Testing, Appendix J, Option B

In a letter dated April 19, 2000,[1] Northeast Nuclear Energy Company (NNECO) proposed to amend Operating License NPF-49 by incorporating changes into Millstone Unit No. 3 Technical Specifications. The proposed changes included the addition of Technical Specification 6.8.4.f, "Procedures and Programs, Containment Leakage Rate Testing Program." The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) with a modification to the proposed Technical Specification 6.8.4.f.

The proposed Technical Specification changes in the above mentioned letter implement a performance based Containment Leakage Testing Program in accordance with 10 CFR Part 50, Appendix J, Option B as a substitute for the requirements of 10 CFR Part 50, Appendix J, Option A. The previously submitted proposed Technical Specification 6.8.4.f provided a description of this program that referenced, in addition to Regulatory Guide (RG) 1.163,[2] two reports: NEI 94-01, "Industry Guideline for Performance-Based Option of 10 CFR 50, Appendix J," Revision 0, and ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements." Since these two reports are already addressed in RG 1.163, there is no need to reference these two reports in the program description. Therefore, NNECO is revising the proposed Technical Specification 6.8.4.f by deleting the wording 'NEI 94-01, "Industry Guideline

(1) R. P. Necci letter to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, Proposed Revision to Technical Specifications TSCR 3-05-00, Performance-Based Containment Leakage Testing, Appendix J, Option B," dated April 19, 2000.

(2) Regulatory Guide 1.163, "Performance Based Containment Leakage-Test Program," dated September 1995.

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for Performance-Based Option of 10 CFR 50, Appendix J," Revision 0; ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements;" as modified by approved exceptions' from the second paragraph on page 6-17 of the retyped pages (Attachment 4 of the letter dated April 19, 2000).

This modification will make the wording of Technical Specification 6.8.4.f consistent with the wording provided in Technical Specification Task Force change traveler TSTF-52, Rev. 3, which was approved by the NRC on March 8, 2000, and with the approved license amendments for Joseph M. Farley Nuclear Plant, Units 1 and 2 (Amendment No. 122 to Facility Operating License No. NPF-2 and Amendment No. 114 to Facility Operating License NPF-8). This modification will not affect the conclusions of the Safety Summary or the Significant Hazards Consideration contained in the letter dated April 19, 2000.

Attachment 1 of this letter contains a marked up version of page 6-17 which was originally provided in Attachment 4 of the letter dated April 19, 2000. Attachment 2 of this letter contains the revised typed version of the same page. Page 6-17 provided in Attachment 2 of this letter should replace page 6-17 in Attachment 4 of the letter dated April 19, 2000.

There are no regulatory commitments contained within this letter.

If you should have any questions on the above, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Necci

Raymond P. Necci
Vice President - Nuclear Technical Services

Sworn to and subscribed before me

this 31st day of August, 2000

Sandra J. Anton

Notary Public

My Commission expires

SANDRA J. ANTON
NOTARY PUBLIC
COMMISSION EXPIRES
MAY 31, 2005

cc: See next page

Attachments (2)

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

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
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Docket No. 50-423
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Attachment 1

Millstone Nuclear Power Station, Unit No. 3

Modification to Proposed Revision to Technical Specifications TSCR 3-05-00
Performance Based Containment Leakage Testing, Appendix J, Option B
Marked Up Page

PROCEDURES AND PROGRAMS (Continued)

2) Pre-planned operating procedures and backup instrumentation to be used if one or more monitoring instruments become inoperable, and

3) Administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.

f. Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions*. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995~~; NEI 94-01, "Industry Guideline for Performance-Based Option of 10 CFR 50, Appendix J," Revision 0; ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements;" as modified by approved exceptions~~.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 38.57 psig.

The maximum allowable containment leakage rate L_a, at P_a, shall be 0.3 percent by weight of the containment air per 24 hours.

Leakage rate acceptance criteria are:

1) Containment overall leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the combined Type B and Type C tests, and $\leq 0.042\ L_a$ for all penetrations that are Secondary Containment bypass leakage paths, and $<0.75\ L_a$ for Type A tests;

2) Air lock testing acceptance criteria are:

   a. Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

   b. For each door, seal leakage rate is $< 0.01\ L_a$ when pressurized to $\geq P_a$.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

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* An exemption to Appendix J, Option A, paragraph III.D.2(b)(ii), of 10 CFR Part 50, as approved by the NRC on December 6, 1985.

Attachment 2

Millstone Nuclear Power Station, Unit No. 3

Modification to Proposed Revision to Technical Specifications TSCR 3-05-00
Performance Based Containment Leakage Testing, Appendix J, Option B
Retyped Page

PROCEDURES AND PROGRAMS (Continued)

2) Pre-planned operating procedures and backup instrumentation to be used if one or more monitoring instruments become inoperable, and

3) Administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.

f. Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions*. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 38.57 psig.

The maximum allowable containment leakage rate L_a, at P_a, shall be 0.3 percent by weight of the containment air per 24 hours.

Leakage rate acceptance criteria are:

1) Containment overall leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the combined Type B and Type C tests, and $\leq 0.042\ L_a$ for all penetrations that are Secondary Containment bypass leakage paths, and $<0.75\ L_a$ for Type A tests;

2) Air lock testing acceptance criteria are:

   a. Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

   b. For each door, seal leakage rate is $< 0.01\ L_a$ when pressurized to $\geq P_a$.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

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* An exemption to Appendix J, Option A, paragraph III.D.2(b)(ii), of 10 CFR Part 50, as approved by the NRC on December 6, 1985.