



**Northeast  
Nuclear Energy**

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The Northeast Utilities System

FEB - 1 2001

Docket No. 50-423  
B18332

RE: 10 CFR 50.90

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

**Millstone Nuclear Power Station, Unit No. 3  
Commitments Regarding the Proposed License Amendment  
Installation of a New Sump Pump System in  
the Engineered Safety Features Building (PLAR 3-00-2)**

The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) our commitments regarding a proposed license amendment request related to the installation of a new sump pump system in the Engineered Safety Features Building (ESFB) at Millstone Unit No. 3.

By letter dated January 26, 2001,<sup>(1)</sup> Northeast Nuclear Energy Company (NNECO) provided the NRC with additional information and responses to five questions received from the NRC staff during a conference call on January 12, 2001.

The regulatory commitments contained in this letter are located in Attachment 1.

The responses to questions 1 and 2 are revised based on a conference call between NNECO and the NRC staff on January 30, 2001, (Attachment 2).

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<sup>(1)</sup> Raymond P. Necci letter to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, Additional Information and Response to Five Questions Regarding, Installation of a New Sump Pump System in the Engineered Safety Features Building (PLAR 3-00-2)," dated January 26, 2001.

ADD1

The information provided in this letter does not affect the conclusions of the safety summary or the significant hazards consideration contained in the letter dated June 30, 2000,<sup>(2)</sup> and revised by the letter dated September 22, 2000.<sup>(3)</sup>

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



Eugene S. Grecheck  
Vice President - Generation

Subscribed and sworn to before me

this 1<sup>st</sup> day of February, 2001

Elena L. Lockett

Notary Public

Date Commission Expires: June 30, 2005

Attachments (2)

ELENA L. LOCKETT  
NOTARY PUBLIC  
COMMISSION EXPIRES  
JUNE 30, 2005

cc: See next page

- <sup>(2)</sup> Raymond P. Necci Letter to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, License Amendment Request - Unreviewed Safety Question Proposed Revision to Final Safety Analysis Report Installation of a New Sump Pump System in the Engineered Safety Features Building (PLAR 3-00-2)," dated June 30, 2000.
- <sup>(3)</sup> Raymond P. Necci Letter to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, License Amendment Request - Unreviewed Safety Question Proposed Revision to Final Safety Analysis Report Installation of a New Sump Pump System in the Engineered Safety Features Building (PLAR 3-00-2) Revised Answer to Question 2 in the Significant Hazards Consideration," dated September 22, 2000.

**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  
Hartford, CT 06106-5127**

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**Attachment 1**

**Millstone Nuclear Power Station, Unit No. 3**

**List of Regulatory Commitments**

List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document.

<b>Number</b>	<b>Commitments</b>	<b>Due</b>
B18332-01	Northeast Nuclear Energy Company (NNECO) is committed to establish criteria for monitoring inleakage rate in the sump by adding a Technical Requirement to the Millstone Unit No. 3 Technical Requirements Manual (TRM) in the form of a Limiting Condition for Operation (LCO), Applicability, Action, and Surveillance sections.	Prior to entering MODE 4 of refueling outage 3R07.
B18332-02	NNECO will establish a calibration schedule for the level indication and alarm instrument loops in accordance with NNECO's Preventive Maintenance Program.	Prior to entering MODE 4 of refueling outage 3R07.

**Attachment 2**

**Millstone Nuclear Power Station, Unit No. 3**

**Installation of a New Sump Pump System in  
the Engineered Safety Features Building (PLAR 3-00-2)  
Revised Responses to Two Questions**

**Revised Responses to Two Questions  
Installation of a New Sump Pump System in  
the Engineered Safety Features Building (ESFB)(PLAR 3-00-2)**

**Question No. 1**

Establish criteria for monitoring inleakage rate in the sump.

**Revised Response**

Northeast Nuclear Energy Company (NNECO) is committed to establish criteria for monitoring inleakage rate in the sump by adding a Technical Requirement to the Millstone Unit No. 3 Technical Requirements Manual (TRM) in the form of a Limiting Condition for Operation (LCO), Applicability, Action, and Surveillance sections.

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The criteria for monitoring the inleakage rate is addressed in the LCO, which requires pump 3SRW-P5 to be OPERABLE. OPERABLE shall mean running in normal operating mode (automatically) with sufficient pump capacity to keep up with the groundwater inleakage rate and be able to reduce the level in collection sump 3SRW\*SUMP6. Pump 3SRW-P5 shall also be considered OPERABLE when placed in Manual Off position for the purpose of preparation and discharge of tank 3SRW-TK1. If pump is not OPERABLE, restore pump to OPERABLE within 8 hours or otherwise enter ACTION Statement of Specification 3.6.1.6. The LCO also requires the groundwater inleakage rate to be less than 2209 gallons per day. With groundwater inleakage rate greater than 2209 gallons per day and pump 3SRW-P5 is OPERABLE, restore inleakage rate within 6 days or otherwise enter ACTION Statement of Specification 3.6.1.6. The 6 days are based on engineering judgment. An inleakage rate of 2209 gal/day shall be the design basis inleakage rate established for the new sump system. This inleakage rate is based on the rate of inleakage required to fill the mitigation capacity of new collection sump 3SRW\*SUMP6 (2946 gallons) in 32 hours. Additionally, procedural requirements will be in place to start appropriate corrective actions if a substantial increase in inleakage rate occurs (an increase of 10% or higher).

**Question No. 2**

Explain how the surveillance to monitor inleakage rate will be conducted.

**Revised Response**

There are 2 level instrument loops associated with sump 3SRW\*SUMP6. The level indication and high level alarm are supplied from the same instrument loop. The level transmitter associated with this instrument loop is a guided wave radar based instrument. The second loop associated with sump 3SRW\*SUMP6 is the automatic

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control loop for pump 3SRW-P5. This control loop employs displacer type level switches which use weighted floats to actuate electrical switches to control pump start and pump shutoff at preset sump levels.

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There is one level indication and alarm instrument loop associated with tank 3SRW-TK1. This indicator is a hydrostatic pressure indicator that converts the pressure into a corresponding level in the tank.

NNECO will establish a calibration schedule for the level indication and alarm instrument loops in accordance with NNECO's Preventive Maintenance Program.

The TRM will include surveillance requirements which call for verifying pump 3SRW-P5 is OPERABLE once per 24 hours, and verify groundwater inleakage rate to be less than 2209 gallons per day based on level change in tank 3SRW-TK1 once per 24 hours.

Monitoring of the sump pump system will be incorporated into daily operations rounds. The necessary parameters needed to determine the inleakage rate will be monitored. The inleakage rate will be calculated and recorded on a daily basis. The inleakage rate will then be compared with the value established in the TRM.

Operator response to high level alarm in the sump will be developed to troubleshoot and repair pump 3SRW-P5, if necessary, such that the design basis capacity of 32 hours is not challenged.