Docket No. 50-423

Mr. Edward J. Mroczka Senior Vice President Nuclear Engineering and Operations Northeast Nuclear Energy Company Post Office Box 270 Hartford, Connecticut 06141-0270

Dear Mr. Mroczka:

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT -EXEMPTION FROM REQUIREMENTS OF APPENDIX J TO 10 CFR PART 50, PARAGRAPH III.A.3 AND CHANGES TO THE TECHNICAL SPECIFICATIONS

(TAC NO. 69273)

Enclosed is the Environmental Assessment which related to your request for exemption from certain requirements of 10 CFR Part 50, Appendix J and associated license amendment for Millstone Unit No. 3. The application for exemption from rule and the application for license amendment was dated August 11, 1988.

This assessment is being forwarded to the Office of the Federal Register for publication.

> Sincerely, verse that stoned by JOHN F. STOCK

David H. Jaffe, Project Manager Project Directorate I-4 Division of Reactor Projects I/II Office of Nuclear Reactor Regulation

Enclosure: Environmental Assessment

cc w/enclosure: See next page

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# NORTHEAST NUCLEAR ENERGY COMPANY MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3 DOCKET NO. 50-423

## ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from the requirements of Appendix J to 10 CFR Part 50 and an associated license amendment to Northeast Nuclear Energy Company, et al. (the licensee) for the Millstone Nuclear Station, Unit No. 3, located at the licensee's site in New London County, Connecticut.

#### **ENVIRONMENTAL ASSESSMENT**

### Identification of Proposed Action:

The licensee is requesting an exemption from Paragraph III.A.3 of 10 CFR Part 50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors" to permit the use of the mass-point method of primary containment leakage testing. In 1973, Appendix J was issued to established requirements for primary containment leakage testing and incorporated by reference ANSI N45.4-1972, "Leakage Rate Testing of Containment Structures for Nuclear Reactors." This standard requires that containment leakage calculations be performed by using either the point-to-point method or the total time method.

At this time, a licensee who wishes to use mass-point must submit an application for exemption from the Appendix J requirement that containment integrated leak rate tests will conform to ANSI N45.4. The exemption proposed

by the licensee would be granted until a proposed revision to Appendix J, which will permit use of the mass-point method, becomes effective. In the mass-point method, the mass of air in containment is calculated and plotted as a function of time and leakage is calculated from the slope of the linear least squares.

With the present developments in technology, the mass-point method has gained increasing recognition.

The superiority of the mass-point method becomes apparent when it is compared with the two other methods. In the total time method, a series of leakage rates is calculated on the basis of air mass differences between an initial data point and each individual data point thereafter. If for any reason (such as instrument error, lack of temperature equilibrium, ingassing or outgassing) the initial data point is not accurate, the results of the test will be affected. In the point-to-point method, the leak rates are based on the mass difference between each pair of consecutive points which are then averaged to yield a single leakage rate estimate. Mathematically, this can be shown to be the difference between the air mass at the beginning of the test and the air mass at the end of the test expressed as a percentage of the containment air mass. It follows from the above that the point-to-point method ignores any mass readings during the test and thus the leakage rate is calculated on the basis of the difference in mass between two measurements taken at the beginning and at the end of the test, which are 24 hours apart.

The licensee's request and bases for exemption are contained in a letter dated August 11, 1988.

The licensee has also requested changes to the Technical Specifications that are related to the containment leak rate test. By application for license amendment dated August 11, 1988, the licensee requested changes to Millstone Unit 3 Technical Specification (TS) 4.6.1.3, "Containment Leakage," to allow for use of ANSI/ANS Standard 56.8-1981 for "mass-point" determination of containment leakage rate.

A "Notice of Consideration of Issuance of Amendment to Facility Operating License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing" regarding the proposed changes to TS 4.6.1.2 was published in the FEDERAL REGISTER on September 21, 1988 (53 FR 36672). The Need for The Proposed Action:

The exemption and associated license amendment are needed to allow use of the mass-point analysis method at Millstone Unit No. 3.

#### Environmental Impacts of the Proposed Action:

The erraticism of the total time method creates a higher probability of unnecessarily failing a containment integrated leakage rate test (note that the calculational procedure is independent of containment tightness) possibly resulting in increased test frequency, critical path outage time, and exposure to test personnel.

Radiological releases will not be greater than previously determined, nor does the proposed exemption otherwise affect radiological plant effluents, or have any other environmental impact. Therefore, the Commission concludes that there are no measurable radiological or non-radiological environmental impacts associated with the proposed exemption and associated license amendment.

#### Alternatives to the Proposed Action:

It has been concluded that there is no measurable impact associated with the proposed exemption and associated license amendment; any alternatives to the exemption and associated license amendment would have either essentially the same or greater environmental impact.

#### Alternative Use of Resources:

This action does not involve the use of any resources different from or beyond the scope of resources used during normal plant operation, which were assessed in the Final Environmental Statement relating to plant operation, NUREG-1064, dated December 1984.

#### Agencies and Persons Consulted:

The Commission's staff reviewed the licensee's request that supports the proposed exemption. The staff did not consult other agencies or persons.

### FINDING OF NO SIGNIFICANT IMPACT

Based upon the foregoing environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed exemption and associated license amendment.

For further details with respect to this action, see the request for exemption and application for license amendment dated August 11, 1988. A copy of the above is available for public inspection at the Commission's Public

Document Room, The Gelman Building, 2120 L Street, NW, Washington, D.C., 20555, and at the local public document room located at the Waterford Public Library, 49 Rope Ferry Road, Route 156, Waterford, Connecticut 06385.

Dated at Rockville, Maryland this 14th day of November , 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Director

Project Directorate I-4

Division of Reactor Projects-I/II Office of Nuclear Reactor Regulation