

February 5, 1996

Mr. Robert E. Busch
President - Energy Resources Group
Northeast Utilities Service Company
c/o Mr. Richard M. Kacich
P.O. Box 128
Waterford, CT 06385

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. M92591)

Dear Mr. Busch:

The Commission has issued the enclosed Amendment No. 126 to Facility Operating License No. NPF-49 for the Millstone Nuclear Power Station, Unit No. 3, in response to your application dated June 9, 1995, with clarifying information provided by letter dated November 9, 1995.

The amendment relocates Surveillance Requirement 4.6.6.1.d.3 to TS 3.6.6.2 and revises the Action Statement of Section 3.6.6.1 to decouple it from Section 3.6.6.2. In addition, Definition 1.12, "Secondary Containment Boundary" is deleted and included in the Bases Section 3/4.6.6, Secondary Containment. Bases Section 3/4.6.6.2, Secondary Containment is expanded using the guidance of the improved standard technical specifications (STS) for Westinghouse plants (NUREG-1431).

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by:

Vernon L. Rooney, Senior Project Manager
Millstone Project Directorate
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosures: 1. Amendment No. 126 to NPF-49
2. Safety Evaluation

cc w/encls: See next page

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PDI-3 Plant CGrimes
SVarga GHill (2)
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SNorris

*SEE PREVIOUS CONCURRENCE

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NAME	SNorris	VRooney:bf	CBerlinger		CGrimes		PMcKee		CMarco	
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DATE	02/ /96	02/ /96	01/23/96		01/24/96		01/22/96	2/5/96	01/29/96	

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 5, 1996

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President - Energy Resources Group
Northeast Utilities Service Company
c/o Mr. Richard M. Kacich
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Waterford, CT 06385

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Sincerely,

A handwritten signature in black ink, appearing to read "V. Rooney".

Vernon L. Rooney, Senior Project Manager
Millstone Project Directorate
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosures: 1. Amendment No. 126 to NPF-49
2. Safety Evaluation

cc w/encls: See next page

R. Busch
Northeast Utilities Service Company

Millstone Nuclear Power Station
Unit 3

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

DOCKET NO. 50-423

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 126
License No. NPF-49

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northeast Nuclear Energy Company, et al. (the licensee) dated June 9, 1995, as supplemented November 9, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-49 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 126, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance, to be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Phillip F. McKee, Director
Millstone Project Directorate
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: February 5, 1996

ATTACHMENT TO LICENSE AMENDMENT NO.126

FACILITY OPERATING LICENSE NO. NPF-49

DOCKET NO. 50-423

Replace the following pages of the Appendix A, Technical Specifications, with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

Remove

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DEFINITIONS

1.12 DELETED

ENGINEERED SAFETY FEATURES RESPONSE TIME

1.13 The ENGINEERED SAFETY FEATURES (ESF) RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF Actuation Setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays where applicable.

1.14 Deleted

FREQUENCY NOTATION

1.15 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

IDENTIFIED LEAKAGE

1.1 IDENTIFIED LEAKAGE shall be:

- a. Leakage (except CONTROLLED LEAKAGE) into closed systems, such as pump seal or valve packing leaks that are captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of Leakage Detection Systems or not to be PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor Coolant System leakage through a steam generator to the Secondary Coolant System.

MASTER RELAY TEST

1.17 A MASTER RELAY TEST shall be the energization of each master relay and verification of OPERABILITY of each relay. The MASTER RELAY TEST shall include continuity check of each associated slave relay.

CONTAINMENT SYSTEMS

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

3.6.1.2 Containment leakage rates shall be limited to:

- a. An overall integrated leakage rate of less than or equal to L_a , 0.3% by weight of the containment air per 24 hours at P_a , 53.27 psia (38.57 psig);
- b. A combined leakage rate of less than $0.60 L_a$ for all penetrations and valves subject to Type B and C tests, when pressurized to P_a ; and
- c. A combined leakage rate of less than or equal to $0.042 L_a$ for all penetrations that are Secondary Containment bypass leakage paths when pressurized to P_a .

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the measured overall integrated containment leakage rate exceeding $0.75 L_a$, or the measured combined leakage rate for all penetrations and valves subject to Type B and C tests exceeding $0.60 L_a$, or the combined bypass leakage rate exceeding $0.042 L_a$, restore the overall integrated leakage rate to less than $0.75 L_a$, the combined leakage rate for all penetrations subject to Type B and C tests to less than $0.60 L_a$, and the combined bypass leakage rate to less than $0.042 L_a$ prior to increasing the Reactor Coolant System temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using methods and provisions of ANSI N45.4-1972 (Total Time Method) and/or ANSI/ANS 56.8-1981 (Mass Point Method):

- a. Three Type A tests (Overall Integrated Containment Leakage Rate) shall be conducted at approximately equal intervals during shutdown at a pressure not less than P_a , 53.27 psia (38.57 psig), during each 10-year service period.*
- b. If any periodic Type A test fails to meet $0.75 L_a$, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet $0.75 L_a$, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet $0.75 L_a$ at which time the above test schedule may be resumed;

*The third Type A test will be conducted during the sixth refueling outage. As a result, the duration of the first 10-year service period will be extended to the end of the sixth refueling outage.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 2) Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978,* meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978,* for a methyl iodide penetration of less than 0.175%; and
 - 3) Verifying a system flow rate of 7600 cfm to 9800 cfm during system operation when tested in accordance with ANSI N510-1980.
- c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978,* meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978,* for a methyl iodide penetration of less than 0.175%:
- d. At least once each REFUELING INTERVAL by:
- 1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.25 inches Water Gauge while operating the system at a flow rate of 7600 cfm to 9800 cfm,
 - 2) Verifying that the system starts on a Safety Injection test signal, and
 - 3) Verifying that the heaters dissipate 50 ± 5 kW when tested in accordance with ANSI N510-1980.

*ANSI N510-1980 shall be used in place of ANSI N510-1975 referenced in Regulatory Guide 1.52, Revision 2, March 1978.

CONTAINMENT SYSTEMS

SECONDARY CONTAINMENT

LIMITING CONDITION FOR OPERATION

3.6.6.2 Secondary Containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With Secondary Containment inoperable, restore Secondary Containment to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENT

4.6.6.2.1 OPERABILITY of Secondary Containment shall be demonstrated at least once per 31 days by verifying that each door in each access opening is closed except when the access opening is being used for normal transit entry and exit.

4.6.6.2.2 At least once each REFUELING INTERVAL, verify each Supplementary Leak Collection and Release System produces a negative pressure of greater than or equal to 0.4 inch water gauge in the Auxiliary Building at 24'-6" elevation within 120 seconds after a start signal.

CONTAINMENT SYSTEMS

SECONDARY CONTAINMENT STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.6.3 The structural integrity of the Secondary Containment shall be maintained at a level consistent with the acceptance criteria in Specification 4.6.6.3.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With the structural integrity of the Secondary Containment not conforming to the above requirements, restore the structural integrity to within the limits within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENT

4.6.6.3 The structural integrity of the Secondary Containment shall be determined during the shutdown for each Type A containment leakage rate test (reference Specification 4.6.1.2) by a visual inspection of the exposed accessible interior and exterior surfaces of the Secondary Containment and verifying no apparent changes in appearance of the concrete surfaces or other abnormal degradation. Any abnormal degradation of the Secondary Containment detected during the above required inspections shall be reported to the Commission in a Special Report pursuant to Specification 6.9.2 within 15 days.

CONTAINMENT SYSTEMS

BASES

3/4.6.6 SECONDARY CONTAINMENT

3/4.6.6.1 SUPPLEMENTARY LEAK COLLECTION AND RELEASE SYSTEM

Background

The OPERABILITY of the Supplementary Leak Collection and Release System (SLCRS) ensures that radioactive materials that leak from the primary containment into the Secondary Containment following a Design Basis Accident (DBA) are filtered out and adsorbed prior to any release to the environment.

Applicable Safety Analyses

The SLCRS design basis is established by the consequences of the limiting DBA, which is a LOCA. The accident analysis assumes that only one train of the SLCRS and one train of the auxiliary building filter system is functional due to a single failure that disables the other train. The accident analysis accounts for the reduction of the airborne radioactive material provided by the remaining one train of this filtration system. The amount of fission products available for release from the containment is determined for a LOCA.

The SLCRS is not normally in operation. The SLCRS starts on a SIS signal. The modeled SLCRS actuation in the safety analysis (the Millstone 3 FSAR Chapter 15, Section 15.6) is based upon a worst-case response time following an SI initiated at the limiting setpoint. One train of the SLCRS in conjunction with the Auxiliary Building Filter (ABF) system is capable of drawing a negative pressure (0.4 inches water gauge at the auxiliary building 24'6" elevation) within 120 seconds after a LOCA. This time includes diesel generator startup and sequencing time, system startup time, and time for the system to attain the required negative pressure after starting.

CONTAINMENT SYSTEMS

BASES

3/4.6.6.1 SUPPLEMENTARY LEAK COLLECTION AND RELEASE SYSTEM (Continued)

LCO

In the event of a DBA, one SLCRS is required to provide the minimum postulated iodine removal assumed in the safety analysis. Two trains of the SLCRS must be OPERABLE to ensure that at least one train will operate, assuming that the other train is disabled by a single-active failure. The SLCRS works in conjunction with the ABF system. Inoperability of one train of the ABF system also results in inoperability of the corresponding train of the SLCRS. Therefore, whenever LCO 3.7.9 is entered due to the ABF train A (B) being inoperable, LCO 3.6.6.1 must be entered due to the SLCRS train A (B) being inoperable.

When a SLCRS LCO is not met, it is not necessary to declare the secondary containment inoperable. However, in this event, it is necessary to determine that a loss of safety function does not exist. A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed.

Applicability

In MODES 1, 2, 3, and 4, a DBA could lead to a fission product release to containment that leaks to the secondary containment. The large break LOCA, on which this system's design is based, is a full-power event. Less severe LOCAs and leakage still require the system to be OPERABLE throughout these MODES. The probability and severity of a LOCA decrease as core power and reactor coolant system pressure decrease. With the reactor shut down, the probability of release of radioactivity resulting from such an accident is low.

In MODES 5 and 6, the probability and consequences of a DBA are low due to the pressure and temperature limitations in these MODES. Under these conditions, the SLCRS is not required to be OPERABLE.

ACTIONS

With one SLCRS train inoperable, the inoperable train must be restored to OPERABLE status within 7 days. The operable train is capable of providing 100 percent of the iodine removal needs for a DBA. The 7-day Completion Time is based on consideration of such factors as the reliability of the OPERABLE redundant SLCRS train and the low probability of a DBA occurring during this period. The Completion Time is adequate to make most repairs. If the SLCRS cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and MODE 5 within the following 30 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full-power conditions in an orderly manner and without challenging plant systems.

CONTAINMENT SYSTEMS

BASES

3/4.6.6.2 SECONDARY CONTAINMENT

The Secondary Containment is comprised of the containment enclosure building and all contiguous buildings (main steam valve building [partially], engineering safety features building [partially], hydrogen recombiner building [partially], and auxiliary building). The Secondary Containment shall exist when:

- a. Each door in each access opening is closed except when the access opening is being used for normal transit entry and exit,
- b. The sealing mechanism associated with each penetration (e.g., welds, bellows, or O-rings) is OPERABLE.

Secondary Containment ensures that the release of radioactive materials from the primary containment atmosphere will be restricted to those leakage paths and associated leak rates assumed in the safety analyses. This restriction, in conjunction with operation of the Supplementary Leak Collection and Release System, and Auxiliary Building Filter System will limit the SITE BOUNDARY radiation doses to within the dose guideline values of 10 CFR Part 100 during accident conditions.

The SLCRS and the ABF fans and filtration units are located in the auxiliary building. The SLCRS is described in the Millstone Unit No. 3 FSAR, Section 6.2.3.

In order to ensure a negative pressure in all areas within the Secondary Containment under most meteorological conditions, the negative pressure acceptance criterion at the measured location (i.e., 24'6" elevation in the auxiliary building) is 0.4 inches water gauge.

LCO

The Secondary Containment OPERABILITY must be maintained to ensure proper operation of the SLCRS and the auxiliary building filter system and to limit radioactive leakage from the containment to those paths and leakage rates assumed in the accident analyses.

Applicability

Maintaining Secondary Containment OPERABILITY prevents leakage of radioactive material from the Secondary Containment. Radioactive material may enter the Secondary Containment from the containment following a LOCA. Therefore, Secondary Containment is required in MODES 1, 2, 3, and 4 when a design basis accident such as a LOCA could release radioactive material to the containment atmosphere.

CONTAINMENT SYSTEMS

BASES

3/4.6.6.2 SECONDARY CONTAINMENT (continued)

In MODES 5 and 6, the probability and consequences of a DBA are low due to the RCS temperature and pressure limitation in these MODES. Therefore, Secondary Containment is not required in MODES 5 and 6.

ACTIONS

In the event Secondary Containment OPERABILITY is not maintained, Secondary Containment OPERABILITY must be restored within 24 hours. Twenty-four hours is a reasonable Completion Time considering the limited leakage design of containment and the low probability of a DBA occurring during this time period. Therefore, it is considered that there exists no loss of safety function while in the ACTION Statement.

Inoperability of the Secondary Containment does not make the SLCRS fans and filters inoperable. Therefore, while in this Action Statement solely due to inoperability of the Secondary Containment, the conditions and required actions associated with Specification 3.6.6.1 (i.e., Supplementary Leak Collection and Release System) are not required to be entered. If the Secondary Containment OPERABILITY cannot be restored to OPERABLE status within the required completion time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within the following 30 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full-power conditions in an orderly manner and without challenging plant systems.

Surveillance Requirements

4.6.6.2.1

Maintaining Secondary Containment OPERABILITY requires maintaining each door in each access opening in a closed position except when the access opening is being used for normal entry and exit. The normal time allowed for passage of equipment and personnel through each access opening at a time is defined as no more than 5 minutes. The access opening shall not be blocked open. During this time, it is not considered necessary to enter the action statement. A 5-minute time is considered acceptable since the access opening can be quickly closed without special provisions and the probability of occurrence of a DBA concurrent with equipment and/or personnel transit time of 5 minutes is low.

The 31-day frequency for this surveillance is based on engineering judgment and is considered adequate in view of the other indications of access opening status that are available to the operator.

CONTAINMENT SYSTEMS

BASES

3/4.6.6.2 SECONDARY CONTAINMENT (continued)

4.6.6.2.2

The ability of a SLCRS to produce the required negative pressure during the test operation within the required time provides assurance that the Secondary Containment is adequately sealed.

With the SLCRS in postaccident configuration, the required negative pressure in the Secondary Containment is achieved in 110 seconds from the time of simulated emergency diesel generator breaker closure. Time delays of dampers and logic delays must be accounted for in this surveillance. The time to achieve the required negative pressure is 120 seconds, with a loss-of-offsite power coincident with a SIS. The surveillance verifies that one train of SLCRS in conjunction with the ABF system will produce a negative pressure of 0.4 inches water gauge at the auxiliary building 24'6" elevation relative to the outside atmosphere in the Secondary Containment. For the purpose of this surveillance, pressure measurements will be made at the 24'6" elevation in the auxiliary building. This single location is considered to be adequate and representative of the entire Secondary Containment due to the large cross-section of the air passages which interconnect the various buildings within the Secondary Containment. In order to ensure a negative pressure in all areas inside the Secondary Containment under most meteorological conditions, the negative pressure acceptance criterion at the measured location is 0.4 inch water gauge. It is recognized that there will be an occasional meteorological condition under which slightly positive pressure may exist at some localized portions of the boundary (e.g., the upper elevations on the down-wind side of a building). For example, a very low outside temperature combined with a moderate wind speed could cause a slightly positive pressure at the upper elevations of the containment enclosure building on the leeward face. The probability of occurrence of meteorological conditions which could result in such a positive differential pressure condition in the upper levels of the enclosure building has been estimated to be less than 2% of the time.

The probability of wind speed within the necessary moderate band, combined with the probability of extreme low temperature, combined with the small portion of the boundary affected, combined with the low probability of airborne radioactive material migrating to the upper levels ensures that the overall effect on the design basis dose calculations is insignificant.

The SLCRS system and fan sizing was based on an estimated infiltration rate. The fan flow rates are verified within a minimum and maximum on a monthly basis. Initial testing verified that the drawdown criterion was met at the lowest acceptable flow rate. The new standard Technical Specification (NUREG-1431) 3.6.6.2 surveillance requirement requires that the drawdown

CONTAINMENT SYSTEMS

BASES

3/4.6.6.2 SECONDARY CONTAINMENT (continued)

criterion be met while not exceeding a maximum flow rate. It is assumed that the purpose of this flow limit is to ensure that adequate attention is given to maintain the SLCRS boundary integrity and not using excess system capacity to cover for boundary degradation.

The SLCRS system was designed with minimal margin and, therefore, does not have excess capacity that can be substituted for boundary integrity. Additionally, since SLCRS fan flow rates are verified to be acceptable on a more frequent basis than the drawdown test surveillance, and by means of previous testing the minimum flow rate is acceptable, verifying a flow rate during the drawdown test would not provide an added benefit. Historical SLCRS flow measurements show a lack of repeatability associated with the inaccuracies of air flow measurement. As a result, the more reliable verification of system performance is the actual negative pressure generated by the drawdown test and a measured flow rate would add little.

3/4.6.6.3 SECONDARY CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the Secondary Containment will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to provide a secondary boundary surrounding the primary containment that can be maintained at a negative pressure during accident conditions. A visual inspection is sufficient to demonstrate this capability.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 126

TO FACILITY OPERATING LICENSE NO. NPF-49

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3

DOCKET NO. 50-423

1.0 INTRODUCTION

By letter dated June 9, 1995, as supplemented November 9, 1995, the Northeast Nuclear Energy Company (the licensee), submitted a request for changes to the Millstone Nuclear Power Station, Unit No. 3, Technical Specifications (TS). The requested changes would relocate Surveillance Requirement 4.6.6.1.d.3 for attaining a negative pressure in the secondary containment from TS 3.6.6.1, Supplementary Leak Collection and Release System (SLCRS), to 3.6.6.2, Secondary Containment. The changes would also revise the Action Statement of LCO for both Section 3.6.6.2 to specify that the conditions and required actions associated with TS 3.6.6.1 and TS 3.6.6.2 are not both required to be entered when either TS 3.6.6.1 or TS 3.6.6.2 is entered. These changes would recognize the direct impact of boundary integrity on the drawdown capability and decouple Sections 3.6.6.1 and 3.6.6.2. The effect of these changes would be to allow the licensee to make planned breaches of the secondary containment in Modes 1, 2, 3, and 4 by entering Action Statement of LCO 3.6.6.2 without having to enter Action Statement of LCO 3.6.6.1. The Action Statement of LCO for TS 3.6.6.2 requires that operability of the secondary containment boundary be restored within 24 hours or that the plant shall be in at least Hot Standby within the next 6 hours. The November 9, 1995, letter provided clarifying information and did not change the initial proposed no significant hazards consideration determination.

The amendment also makes some administrative changes. Definition 1.12, "Secondary Containment Boundary," is relocated to the Bases, and the term "Secondary Containment Boundary" is changed to "Secondary Containment" in various places.

2.0 EVALUATION

The licensee has historically entered into Action Statement of LCO 3.6.6.2 whenever a breach of secondary containment was planned. Action Statement of LCO 3.6.6.2 requires that in the event the secondary containment boundary operability is not maintained, operability must be restored within 24 hours. The licensee, as a result of a current interpretation of its TS, enters Surveillance Requirements for other connected systems that are also affected

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such as the Supplementary Leak Collection and Release Systems (SLRS) during planned breaches of secondary containment. A conflict was identified relative to entry into the Surveillance and Action Requirements of LCO 3.6.6.1, (SLCRS) which would have required entry into TS 3.0.3, and consequently, a plant shutdown for any planned breach.

The LCO for TS 3.6.6.1 states that two SLCRS shall be operable; the associated Action Statement addresses actions to be taken if one such system is inoperable but does not address actions to be taken if both systems are inoperable. Surveillance Requirement 4.6.6.1.d.3 requires that at least every 18 months the SLCRS is demonstrated operable by verifying that each system can draw a vacuum of 0.4 inches of water as measured at a specific height in the Auxiliary Building. Were this Surveillance Requirement to be performed while there was a breach in the secondary containment, the licensee anticipates that both systems would fail; therefore, both systems would have to be considered inoperable and the licensee would have to enter TS 3.0.3.

The proposed changes to the TS will resolve this problem by decoupling TS 3.6.6.1 and 3.6.6.2; the licensee will, when breaching the secondary containment, enter only the Action Statements for TS 3.6.6.2. In the event that secondary containment operability is not maintained, the Action Statement for LCO 3.6.6.2 requires that secondary containment operability must be restored within 24 hours. The staff has determined that 24 hours is a reasonable completion time considering the limited leakage design of containment and the low probability of a design basis accident occurring during this period. The staff recognizes that the performance of the SLCRS will be degraded during the time that the containment is breached; however, the system will still be effective in reducing the levels of radionuclides released to the outside environment in the unlikely event of a design basis accident occurring during this period. This situation was recognized by the staff and has been addressed in the improved standard technical specifications for Westinghouse plants (NUREG-1431). The staff considers the proposed changes to TS 3.6.6.1 and 3.6.6.2 acceptable.

The relocation of Definition 1.12 to the Bases and the changing of "Secondary Containment Boundary" to "Secondary Containment" are administrative. The staff finds these changes acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined

that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 39445). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: G. Wunder

Date: February 5, 1996