

Mr. John F. Opeka  
 Executive Vice President, Nuclear  
 Connecticut Yankee Atomic Power Company  
 Northeast Nuclear Energy Company  
 Post Office Box 270  
 Hartford, CT 06141-0270

September 29, 1994

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. M90379)

Dear Mr. Opeka:

The Commission has issued the enclosed Amendment No. 96 to Facility Operating License No. NPF-49 for the Millstone Nuclear Power Station, Unit No. 3, in response to your application dated September 17, 1994.

The amendment revises the Technical Specifications (TS) Surveillance Requirements 4.3.2.2, 4.6.3.1, 4.7.1.5.2, and 4.7.1.2.1.b by noting that Surveillance Requirement 4.0.4 is not applicable. The amendment allows the plant to enter Modes 4 and 3, as necessary, to perform the required operability tests for the Main Steam Isolation Valves, the engineered safety feature actuation system and the turbine-driven Auxiliary Feedwater pump.

A copy of the related Safety Evaluation is also enclosed. The notice of issuance, final determination of no significant hazards consideration, and opportunity for a hearing, will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by:

Vernon L. Rooney, Senior Project Manager  
 Project Directorate I-4  
 Division of Reactor Projects - I/II  
 Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosures: 1. Amendment No.96 to NPF-49  
 2. Safety Evaluation

cc w/encls: See next page

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Docket File	SVarga	VRooney	ACRS (10)
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NAME	SNorris	VRooney:dn	JStolz	CGrimes	#4-207	C Mexico	
DATE	09/26/94	09/26/94	09/26/94	09/26/94		09/27/94	
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DATE	09/19/94						

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OFFICE	ADRI:DRPE					
NAME	CMiller					
DATE	09/19/94					

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Mr. John F. Opeka  
Northeast Nuclear Energy 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. 96  
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 September 17, 1994, 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. 96, 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.

FOR THE NUCLEAR REGULATORY COMMISSION



Charles L. Miller, Acting Assistant Director  
for Region I Reactors  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: September 29, 1994

## INSTRUMENTATION

### SURVEILLANCE REQUIREMENTS

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4.3.2.1 Each ESFAS instrumentation channel and interlock and the automatic actuation logic and relays shall be demonstrated OPERABLE by performance of the ESFAS Instrumentation Surveillance Requirements specified in Table 4.3-2.

4.3.2.2 The ENGINEERED SAFETY FEATURES RESPONSE TIME\* of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months.\*\* Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel (to include input relays to both trains) per function such that all channels are tested at least once per N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" column of Table 3.3-3.

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\*The provisions of Specification 4.0.4 are not applicable for response time testing of steam line isolation for entry into MODE 4 and MODE 3 and turbine driven auxiliary feedwater pump for entry into MODE 3.

\*\*Except that the surveillance requirements due no later than June 13, 1993, may be deferred until the next refueling outage, but no later than September 30, 1993, whichever is earlier.

## CONTAINMENT SYSTEMS

### 3/4.6.3 CONTAINMENT ISOLATION VALVES

#### LIMITING CONDITION FOR OPERATION

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3.6.3 The containment isolation valves shall be OPERABLE with isolation times less than or equal to the required isolation times.

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

ACTION:

With one or more of the isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

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4.6.3.1 Each isolation valve shall be demonstrated OPERABLE\* prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit by performance of a cycling test and verification of isolation time.

4.6.3.2 Each isolation valve shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

- a. Verifying that on a Phase "A" Isolation test signal, each Phase "A" isolation valve actuates to its isolation position,
- b. Verifying that on a Phase "B" Isolation test signal, each Phase "B" isolation valve actuates to its isolation position, and
- c. Verifying that on a Containment High Radiation test signal, each purge supply and exhaust isolation valve actuates to its isolation position.

4.6.3.3 The isolation time of each power-operated or automatic valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

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\*The provisions of Specification 4.0.4 are not applicable for main steam line isolation valves entry into MODE 3 and MODE 4.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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- 3) Verifying that each non-automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in its correct position; and
  - 4) Verifying that each auxiliary feedwater control and isolation valve in the flow path is in the fully open position when above 10% RATED THERMAL POWER.
- b. At least once per 18 months during shutdown by verifying that each auxiliary feedwater pump starts as designed automatically upon receipt of an Auxiliary Feedwater Actuation test signal. For the steam turbine-driven auxiliary feedwater pump, the provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

4.7.1.2.2 An auxiliary feedwater flow path to each steam generator shall be demonstrated OPERABLE following each COLD SHUTDOWN of greater than 30 days prior to entering MODE 2 by verifying flow to each steam generator.

## PLANT SYSTEMS

### MAIN STEAM LINE ISOLATION VALVES

#### LIMITING CONDITION FOR OPERATION

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3.7.1.5 Each main steam line isolation valve (MSIV) shall be OPERABLE.

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

ACTION:

MODE 1:

With one MSIV inoperable but open, POWER OPERATION may continue provided the inoperable valve is restored to OPERABLE status within 4 hours; otherwise be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

MODES 2, 3, and 4:

With one MSIV inoperable, subsequent operation in MODE 2, or 3, or 4 may proceed provided the isolation valve is maintained closed. Otherwise, be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

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4.7.1.5 Each MSIV shall be demonstrated OPERABLE by verifying full closure within 5 seconds in Modes 1, 2, and 3 when tested pursuant to Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

4.7.1.5.2 Each MSIV shall be demonstrated OPERABLE by verifying full closure within 120 second in Mode 4 when tested pursuant to Specification 4.0.5. The provisions of Specification 4.0.4 are not applicable for entry into MODE 4.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 96

TO FACILITY OPERATING LICENSE NO. NPF-49

NORTHEAST NUCLEAR ENERGY COMPANY

THE CONNECTICUT LIGHT AND POWER COMPANY

THE WESTERN MASSACHUSETTS ELECTRIC COMPANY

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3

DOCKET NO. 50-423

1.0 INTRODUCTION

By letter dated September 17, 1994, the Northeast Nuclear Energy Company (NNECO or the licensee) requested an amendment to change the Technical Specifications (TS) for the Millstone Nuclear Power Station, Unit No. 3. The proposed amendment would revise the TS by adding a footnote to Surveillance Requirements 4.3.2.2, 4.6.3.1 and 4.7.1.2.1.b which will allow Millstone Unit 3 to enter Modes 4 and 3, respectively, to perform the operability tests for the Main Steamline Isolation Valves (MSIVs) and the turbine-driven Auxiliary Feedwater (AFW) pump. Additionally, the amendment corrects a typographical error in TS 4.7.1.5.2 which prevented accomplishing required MSIV testing in Mode 4. The licensee requested that the NRC staff process the proposed amendment on an emergency basis pursuant to 10 CFR 50.91(a)(5), since failure to act in a timely way would prevent Millstone Unit 3 from resuming operation.

2.0 BACKGROUND AND DISCUSSION

On September 8, 1994, with Millstone Unit 3 in Mode 1, NNECO tested the "C" MSIV, and found it to have a closure time greater than permitted by Surveillance Requirement 4.7.1.5.1 of the Millstone Unit 3 Technical Specifications. While NNECO was performing an additional monthly MSIV partial stroke test, the "C" MSIV unexpectedly went closed. When this occurred, the plant was manually tripped. The required safety systems operated as designed. However, the turbine-driven AFW pump which started automatically on low-low steam generator water level tripped on overspeed. As a result, the turbine-driven AFW pump was determined to be inoperable. During review of the surveillance requirements for the turbine-driven AFW pump, NNECO discovered that relief from the requirement of Technical Specification 4.0.4 was required for entry into Mode 3 so that the operability of the turbine-driven AFW pump could be demonstrated. Technical Specification 4.0.4 requires that for entry

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into an operational mode, surveillance required in that mode has been performed. Operability of the turbine-driven AFW pump cannot be demonstrated in Modes 4, 5, or 6 because there is insufficient steam pressure to perform a valid test. Also, NNECO identified that a similar relief from Technical Specification 4.0.4 is required for Surveillance Requirements 4.6.3.1 and 4.3.2.2 in order to permit required turbine-driven AFW and MSIV testing. Additionally, NNECO discovered Technical Specification 4.7.1.5.2, contained a typographical error which prevented accomplishing required MSIV testing in Mode 4.

By letter dated September 17, 1994, NNECO proposed a license amendment which would modify Surveillance Requirements 4.3.2.2, 4.6.3.1, 4.7.1.5.2 and 4.7.1.2.1.b by noting that surveillance requirement 4.0.4 is not applicable to these requirements. This would allow the plant to enter Modes 4 and 3, as necessary, to perform the operability tests for the MSIVs, the engineered safety feature (ESF) actuation system and the turbine-driven AFW pump. NNECO also requested that the NRC staff exercise enforcement discretion associated with the Action Statements of Limiting Conditions for Operation (LCO) 3.3.2, 3.6.3, 3.7.1.2 and 3.7.1.5 to be effective until the proposed license amendment is issued. The enforcement discretion would permit NNECO to conduct testing and operate Millstone Unit 3 in Modes 1, 2, 3 or 4 while the proposed license amendment is being processed, provided that the tests were successful in verifying operability. On September 17, 1994, the NRC orally granted NNECO's request for enforcement discretion regarding TS 3.3.2, 3.6.3, 3.7.1.2, and 3.7.1.5, and by letter dated September 20, 1994, the NRC issued a Notice of Enforcement Discretion confirming the action.

Emergency action is necessary in order to prevent delay in resuming operation and to minimize the effective time of enforcement discretion.

### 3.0 EVALUATION

The AFW system supplies feedwater to the steam generator to remove decay heat from the reactor coolant system (RCS) upon the loss of normal feedwater supply. Millstone Unit 3 has two motor-driven AFW pumps and one turbine-driven AFW pump. The turbine-driven AFW pump receives steam from three steam lines upstream of the MSIVs. The turbine-driven AFW pump feeds all four steam generators. To ensure that the turbine-driven AFW pump is capable of fulfilling its safety function, the Millstone Unit 3 TS require that the operability of the pump be demonstrated. On September 8, 1994, when the plant was tripped manually, the turbine-driven AFW pump started automatically as designed. However, shortly after it tripped on overspeed. Consequently, NNECO declared the turbine-driven AFW pump inoperable. To resume plant operations, Millstone Unit 3 was required to meet the TS operability requirements for the turbine-driven AFW pump. Sufficient steam for testing the turbine-driven AFW pump was not available in Mode 4, but would be available in Mode 3. TS 4.0.4 requires that operability be demonstrated before entry into Mode 3, however.

The MSIVs serve to isolate the nonsafety-related portions of the main steam system under design basis accident conditions. The MSIVs also prevent the uncontrolled blowdown of more than one steam generator in the event of a main steam line break accident. The "C" MSIV was determined to be inoperable prior to shutdown. Following the declaration of inoperability, and subsequent maintenance, it was necessary that operability of the MSIVs be demonstrated. MSIVs have an operability requirement for full closure within 120 seconds in Mode 4 and within 5 seconds in Modes 1, 2, and 3. Technical Specification 4.0.4 requires that operability for each mode be demonstrated before entering into the mode. Steam is the working fluid for operating the MSIVs. Sufficient steam is not available for testing as required for entering into Modes 3 and 4, before entering into Modes 3 and 4.

Optimum testing with respect to safety involves operability testing at a condition in which testing is functionally possible, and yet presents the least risk. The proposed TS changes accomplish this. These changes do not have any impact on the accidents previously evaluated. The proposed changes do not modify the surveillance acceptance criteria nor do they change the frequency of the surveillance. The proposed changes do not have any adverse impact on the design basis accident radiation dose calculations, because the proposed testing condition or method is not an assumption in any of those dose calculations. Therefore, the proposed changes do not pose a condition adverse to safety, and there are no adverse safety consequences created by the proposed changes.

The proposed change to Surveillance Requirement 4.7.1.5.2 simply corrects a typographical error that was introduced in Amendment No. 46.

#### 4.0 TECHNICAL SPECIFICATION CHANGES

The following TS changes have been proposed. The staff finds these changes acceptable.

NNECO is proposing to modify Surveillance Requirements 4.3.2.2, 4.6.3.1, and 4.7.1.2.1.b by adding footnotes which state that the provisions of TS 4.0.4 are not applicable for entry into Modes 3 and 4. This will allow the plant to enter Modes 4 and 3, respectively, to perform the operability tests for the MSIVs and the turbine-driven AFW pump.

Surveillance Requirement 4.7.1.5.2 is being revised to correct a typographical error that occurred during the processing of license Amendment No. 46 which was issued February 21, 1990. The last sentence of Surveillance 4.7.1.5.2 currently reads as follows: "The provisions of Specification 4.0.4 are not applicable for entry into Mode 3." The last sentence of Surveillance Requirement 4.7.1.5.2 will now read as follows: "The provisions of Specification 4.0.4 are not applicable for entry into Mode 4."

## 5.0 EMERGENCY CIRCUMSTANCES

By letter dated September 17, 1994, NNECO requested an amendment to change the TS for Millstone Unit 3. The proposed amendment would revise the TS by adding a footnote to Surveillance Requirements 4.3.2.2, 4.6.3.1 and 4.7.1.2.1.b which will allow Millstone Unit 3 to enter Modes 4 and 3, respectively, to perform the operability tests for the MSIVs and the turbine-driven AFW pump. The licensee requested that the NRC Staff process the proposed amendment on an emergency basis pursuant to 10 CFR 50.91(a)(5), since failure to act in a timely way would prevent Millstone Unit 3 from resuming operation.

The licensee gave the following reasons to support emergency action: The plant was manually tripped because of the closure of the "C" MSIV during a partial stroke test. During the trip, the turbine-driven AFW pump tripped on overspeed. Repairs have been performed and operability of the MSIVs must be established through retesting. Turbine-driven AFW pump operability must also be established, however, this requires adequate steam pressure which cannot be obtained in Mode 4.

In their September 17, 1994 letter NNECO also requested that the NRC staff exercise enforcement discretion associated with the Action Statements of Limiting Conditions for Operation (LCO) 3.3.2, 3.6.3, 3.7.1.2 and 3.7.1.5 to be effective until the proposed license amendment is issued. The enforcement discretion would permit NNECO to conduct testing and operate Millstone Unit 3 in Modes 1, 2, 3 or 4 while the proposed license amendment is being processed, provided that the tests were successful in verifying operability. On September 17, 1994, the Nuclear Regulatory Commission (NRC) orally granted Northeast Nuclear Energy Company's (NNECO's) request for enforcement discretion regarding Technical Specifications 3.3.2, 3.6.3, 3.7.1.2, and 3.7.1.5, and by letter dated September 20, 1994 the NRC issued a Notice of Enforcement Discretion confirming the action.

The staff determined that the request for amendment warranted an emergency basis in order to prevent delay in resuming operation and to minimize the effective time of enforcement discretion.

The NRC staff does not believe that NNECO has abused the emergency provisions of 10 CFR 50.91(a)(5) in this instance. In accordance with 10 CFR 50.91(a)(5) the Commission has determined that emergency circumstances exist warranting prompt action, the situation could not have been avoided, and the licensee and the Commission must act quickly and time does not permit the Commission to publish a Federal Register notice allowing 30 days for prior public comment. The Commission has also determined that the amendment, as discussed in Section 6.0, does not involve a significant hazards consideration.

## 6.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has made a final determination that the amendment involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92(c), this means that the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the

probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The Commission has evaluated the proposed changes against the above standards as required by 10 CFR 50.91(a) and has concluded that the changes do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

Accidents previously evaluated are not worsened by these changes, nor is the probability increased. No accidents that have been evaluated are affected by these changes. These changes involve entering into Modes 3 or 4 (as appropriate) without having demonstrated operability of equipment which requires adequate steam pressure in order to demonstrate operability. The changes will improve plant safety by permitting operability tests to be performed, which are otherwise not possible. Operability tests improve confidence that safety equipment will perform its intended function when called upon to do so. No revision in acceptance criteria results from these changes.

Based on the above, the proposed changes do not involve an increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

These changes do not introduce any new failure modes. Also the changes do not make any physical or operational change to existing plant structures, systems, or components. These changes involve entering into Modes 3 or 4 (as appropriate) without having demonstrated operability of equipment which requires adequate steam pressure in order to demonstrate operability. The changes will improve plant safety by permitting operability tests to be performed, which are otherwise not possible. Operability tests improve confidence that safety equipment will perform its intended function when called upon to do so. No revision in acceptance criteria results from these changes.

Thus, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Involve a significant reduction in the margin of safety.

The proposed changes do not have any adverse impact on the FSAR analyses. The applicable acceptance criteria for the MSIVs and the turbine-driven AFW pump will not be modified by these proposed changes. The proposed changes will permit the tests to be conducted under the proper conditions, so that the ability of the MSIVs and the turbine-driven AFW pump to perform their intended safety function can be confirmed.

For the above reasons we conclude that there is no significant reduction in the margin of safety.

#### 7.0 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.

#### 8.0 ENVIRONMENTAL CONSIDERATION

The amendment 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 made a final no significant hazards consideration determination with respect to this amendment. 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.

#### 9.0 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: V. Rooney

Date: September 29, 1994