

December 29, 2004

Mr. David A. Christian  
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Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 3 - REQUEST FOR ADDITIONAL  
INFORMATION REGARDING USE OF ALTERNATE SOURCE TERM (TAC NO.  
MC3333)

Dear Mr. Christian:

By letter dated May 27, 2004, you requested an amendment to the technical specifications for the Millstone Power Station, Unit No. 3. The proposed amendment would allow the use of an alternate source term.

The Nuclear Regulatory Commission staff has determined that the enclosed questions must be addressed before we can complete our review. These questions were forwarded electronically to Mr. Paul Willoughby of your staff on December 6, 2004. Additionally, they were discussed in a telephone call with Mr. Willoughby and other members of your staff on December 14, 2004. I understand that you intend to respond to this request for additional information within 30 days of the date of this letter. If you have any questions, I can be reached at (301) 415-1494.

Sincerely,

*/RA/*

George F. Wunder, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-423

cc: See next page

Enclosure: Request for Additional Information

## REQUEST FOR ADDITIONAL INFORMATION

### MILLSTONE POWER STATION, UNIT NO. 3

#### USE OF ALTERNATE SOURCE TERM

Regulatory Guide (RG) 1.52 establishes the criterion for penetration in the laboratory testing of engineered safety feature filter systems. In Revision 2 of RG 1.52, the allowable penetration for a 2-inch bed filter is less than 1 percent. In Revision 3 of RG 1.52, some relaxation was allowed and the penetration criterion for a 2-inch bed during a laboratory test was increased to less than 2.5 percent, based in part on maintaining a safety factor of 2. The current Millstone Power Station, Unit No. 3 technical specification (TS) for the control room emergency ventilation filter allows 2.5 percent penetration and is in compliance with RG 1.52, Revision 3. The submittal requests a TS surveillance change to allow a 5-percent penetration test criteria. The Nuclear Regulatory Commission staff does not have sufficient information on filter performance for test penetration criteria lower than specified in your existing TSs.

The fact that lower filter efficiencies were assumed in the design basis analysis does not necessarily support reducing filter efficiency test requirements. The surveillance requirement is based on system parameters for a 2-inch deep filter considering residence time and other parameters using clean carbon adsorbers.

In addition, consideration is given to the change in efficiency over time so that there will be reasonable assurance that the filter will have the required efficiency at the end of the test interval, as well as at the beginning of the test interval. Performance of carbon adsorbers at other efficiencies as a result of depletion of adsorber sites over the time of the test interval have not been evaluated. Please justify the acceptability of reducing the testing criteria in your existing TS.

Enclosure

Millstone Power Station, Unit No. 3

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Millstone Power Station, Unit No. 3

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