

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
 WESTERN MASSACHUSETTS ELECTRIC COMPANY
 HOLYOKE WATER POWER COMPANY
 NORTHEAST UTILITIES SERVICE COMPANY
 NORTHEAST NUCLEAR ENERGY COMPANY

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July 10, 1990

Docket No. 50-423
B13550

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Remote Shutdown Monitoring Instrumentation

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend operating license NPF-49 by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 3.

Description of Proposed Changes

The proposed change to Table 3.3-9 would realign the column headings for "Total No. of Channels" and "Minimum Channels Operable." There are no other changes to Table 3.3-9. This proposed change is necessary to correct an administrative oversight that occurred during preparation of the initial Millstone Unit No. 3 Technical Specifications.

The proposed change to Table 4.3-6 will make the monthly channel check for the source range nuclear instrument applicable only when below the P-6 interlock setpoint. The reason for this proposed change is that the source range nuclear instrument is not in service with the reactor at power. During the initial process of developing the Technical Specifications for Millstone Unit No. 3, NNECO proposed⁽¹⁾ the addition of a footnote to Table 4.3-6 documenting that the channel check for the source range nuclear instrument is not applicable with power above P-6. This change was never incorporated into the Millstone Unit No. 3 Technical Specifications.

The change proposed herein adds a footnote to item 14 of Table 4.3-6, Source Range Count Rate, specifying that the monthly channel check can only be

(1) J. F. Opeka letter to B. J. Youngblood, Millstone Nuclear Power Station, Unit No. 3 Technical Specifications--Proof and Review, dated September 9, 1985.

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performed when below the P-6 intermediate range neutron flux interlock setpoint. The P-6 permissive is generated when either intermediate range channel is above 1×10^{-10} amps. This permissive allows the operator to block the source range high flux reactor trip and deenergize the instrument during a normal reactor startup. During a shutdown evolution, if both channels go below 1×10^{-10} amps, the source range detectors will be automatically energized.

A channel check is the qualitative assessment of channel behavior during plant operation by observation. This determination involves the comparison of indicated parameter values for each channel of a particular function. It is based on the assumption that the channels indicated in the control room should read approximately the same. If a channel is outside of the match criteria, it may be an indication that the transmitter or the racks have drifted outside of their limit. If the channels are within the match criteria, it is a reasonable assumption that the channels are within specification. If the channels are normally off-scale during plant operation, then the channel check will only verify that they are off-scale in the same direction. Since the initial startup of Millstone Unit No. 3, the monthly surveillance (channel check) have been performed to verify that the channels are off-scale (low) during plant operation.

Significant Hazards Consideration

NNECO has reviewed the proposed changes in accordance with 10CFR50.92 and has concluded that the changes do not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve a significant hazards consideration because the changes would not:

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

The proposed changes to Table 3.3-9 would correctly realign the column headings to reflect "Total No. of Channels" and "Minimum Channels Operable." There are no other changes to Table 3.3-9, nor are there any changes in the way the plant is operated. The proposed change is being made to correct an administrative oversight that occurred during preparation of the initial Millstone Unit No. 3 Technical Specifications.

The proposed change to Table 4.3-6 will more accurately reflect the surveillance requirements associated with the source range count rate instrument. Since the instrument is only operable below the P-6 interlock setpoint, it is inappropriate to perform a surveillance on it during power operation. These proposed changes will have no negative impact on the probability of occurrence of any design basis accident. There are no safety systems associated with these proposed changes, nor are any failure modes affected by these changes.

2. Create the possibility of a new or different kind of accident from any previously analyzed. The proposed changes to Tables 3.3-9 and 4.3-6 are considered an improvement to the Millstone Unit No. 3 Technical Specifications.

The changes to Table 3.3-9 will correctly realign the column headings for "Total No. of Channels" and "Minimum Channels Operable." There are no other changes being made to this table.

The changes to Table 4.3-6 will more accurately reflect the surveillance requirements for the source range count rate nuclear instrument. Since this instrument is only operable when below the P-6 interlock setpoint (zero power), it is inappropriate to perform a surveillance on it during power operation.

Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created. No new failure modes are introduced.

3. Involve a significant reduction in a margin of safety. Since the proposed changes to Tables 3.3-9 and 4.3-6 do not affect the consequences of any accident previously analyzed, there is no reduction in the margin of safety.

In summary, for the reasons identified above, NNECO has concluded that continued operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51FR7751) of amendments that are considered not likely to involve a significant hazards consideration. Although the proposed changes are not enveloped by a specific example, the proposed changes would not involve a significant increase in the probability or consequences of an accident previously analyzed. The changes to Table 3.3-9 realign the column headings for "Total No. of Channels" and "Minimum Channels Operable" to correct a typographical error that occurred during the initial preparation of the Millstone Unit No. 3 Technical Specifications. The changes to Table 4.3-6 will more accurately reflect the surveillance requirements for the source range count rate nuclear instrument, which are only operable when below the P-6 interlock setpoint. Since these instruments are only operable during zero power operations (below P-6) it is appropriate to perform a surveillance only during this time. The proposed changes are intended to clarify the Technical Specifications and more accurately represent surveillance requirements.

Based upon the information contained in this submittal and the environmental assessment for Millstone Unit No. 3, there are no radiological or nonradiological impacts associated with the proposed changes and the proposed

U.S. Nuclear Regulatory Commission
B13550/Page 4
July 10, 1990

license amendment will not have a significant effect on the quality of the human environment.

The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved the attached proposed revisions and has concurred with the above determinations.

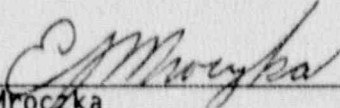
In accordance with 10CFR50.91(b), NNECO is providing the State of Connecticut with a copy of this proposed amendment.

Regarding our proposed schedule for this amendment, we request issuance at your earliest convenience with the amendment effective within 30 days upon issuance.

Should you have any questions regarding the attached amendment request, please contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



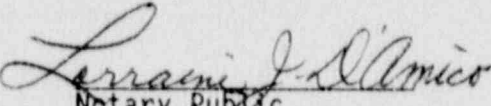
E. J. Mroczka
Senior Vice President

cc: Kevin McCarthy, Director
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Hartford, CT 06116

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D. H. Jaffe, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit No. 3

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.



Notary Public
My Commission Expires March 31, 1993