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General Offices · Seiden Street, Berlin, Connecticut

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September 26, 1990

Docket No. 50-423 B13637

Re: 10CFR50.63

Dr. T. E. Murley, Director Office of Nuclear Reactor Regulation Mail Stop 12 G18 U.S. Nuclear Regulatory Commission Washington, DC 20555

Dear Dr. Murley:

Millstone Nuclear Power Station, Unit No. 3 Response to Safety Evaluation for Station Blackout

By letter dated April 17, 1989, (1) pursuant to 10CFR50.63, Northeast Nuclear Energy Company (NNECO) submitted the response to the station blackout (SBO) rule for Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3. Additional information was provided by letters dated May 30, 1989, (2) and March 30, 1990.

The NRC Staff, by letter dated August 20, 1990, (4) transmitted to NNECO the Staff's Safety Evaluation Report (SER) and the Technical Evaluation Report

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E. J. Mroczka letter to T. E. Murley, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, "Response to Station Blackout Rule," dated April 17, 1989.

<sup>(2)</sup> E. J. Mroczka letter to T. E. Murley, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, "Response to Station Blackout Rule, Additional Information," dated May 30, 1989.

<sup>(3)</sup> E. J. Mroczka letter to T. E. Murley, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, "Response to Station Blackout, Additional Information," dated March 30, 1990.

<sup>(4)</sup> D. H. Jaffe letter to E. J. Mroczka, "Millstone Nuclear Power Station, Unit 3--Station Blackout Evaluation (TAC No. 58568)," dated August 20, 1990.

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(TER) developed by Science Applications International Corporation (SAIC' for the Millstone Nuclear Power Station, Unit No. 3, SBO rule response. The letter required, pursuant to 10CFR50.63(c)(4), a response to the Staff within 30 days of receipt of the SER.

The SER was received by NNECO on August 27, 1990, and subsequently reviewed by NNECO. The following statements provide the Staff with NNECO's response to the SER and include any schedule for implementation of required hardware and associated procedure modifications.

Presently, the hardware modification is the installation of an independent air-cooled diesel generator as the alternate AC (AAC) source for Millstone Unit No. 3. The scheduled completion of this modification and associated procedures is the end of the 1992 refueling outage, currently planned to commence October 1992. NNECO realizes that completion of the equipment and procedure modifications exceeds the two-year window as defined in 10CFR50.63(c)(4). However, the diesel generator installation cannot be completed until the 1992 refueling outage due to equipment procurement, design lead times, and because:

- Power connections and modifications to 4-kV Buses 34A and 34B require a dead bus for personnel safety. It is appropriate to conduct the modifications during the refueling outage conditions where a 4-kV bus is not required to meet Technical Specifications.
- 2. The testing of the SBO diesel generator will require a safety 4-kV bus and its associated nonsafety bus (34A and 34C or 34B and 34D) to be de-energized to simulate an SBO condition. It is appropriate to conduct the testing during refueling outage conditions where a safety bus (34C or 34D) could be taken out of service per Technical Specifications.

The difference in time between the two-year window and the start of the 1992 refueling outage is approximately two months.

In summary, since the modifications and testing are so extensive, it is appropriate to conduct both of these activities when the plant is in a refueling outage. Therefore, NNECO plans to complete the necessary modifications and any associated testing during the Millstone Unit No. 3 1992 refueling outage.

NNECO has also reviewed the Staff's recommendations contained in the SER. Any additional analyses and confirmations will be performed as applicable, and the resulting documentation will be maintained in our files. All documentation necessary to support conformance with the SBO rule is available for further inspection and assessment by the Staff.

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Should the Staff have any additional questions, please contact my staff directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Myoczka Senior Vice President

cc: T. T. Martin, Region I Administrator
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

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

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