

April 6, 1994

Docket No. 50-423

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

Dear Mr. Opeka:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING REVIEW OF IPEEE FOR  
EXTERNAL EVENTS (TAC NO. M83643)

In our review of your Millstone Unit 3 IPEEE submittal of December 23, 1991,  
in response to Generic Letter 88-20, Supplement 4, we find that we need  
additional information. Please provide the information described in the  
enclosure to this letter within 60 days of the date of this letter.

This requirement affects one respondent and, therefore, is not subject to  
Office of Management and Budget review under P.L. 96-511.

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

Enclosure:  
Request for Additional  
Information

cc w/enclosure:  
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NAME	SNorris	VRooney:bp	JStolz		
DATE	4/6/94	4/6/94	4/6/94		/ /

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in black ink, appearing to read "V. Rooney", with a long horizontal stroke extending to the right.

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

Enclosure:  
Request for Additional  
Information

cc w/enclosure:  
See next page

Mr. John F. Opeka  
Northeast Nuclear Energy Company

Millstone Nuclear Power Station  
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Waterford, Connecticut 06385

## ENCLOSURE

### REQUEST FOR ADDITIONAL INFORMATION

#### Examination Description

##### 1. ROAD MAP

Appendix C of NUREG-1407 requests the licensee "to submit their IPEEE reports using the standard table of contents given in Table C.1 or provide a cross reference." Please provide a cross reference between the MP3 PSS submittal and the requested detailed documentation and reporting guidelines as contained in Appendix C of NUREG-1407.

#### Internal Fires Analysis

##### 2. FIRE INITIATED EVENTS DATABASE USED

As indicated in your submittal, the American Nuclear Insurers (ANI) database on safety losses were used for determining the frequency of fire per reactor year for the following areas: diesel generator areas, containment, cable spreading room, control room, turbine building, and auxiliary building. This database was generated in 1978 that contains 37 fire events over a period of approximately 300 reactor years of operation. The staff has found this database to be limited since it is over fifteen years old and does not represent current fire frequencies. Please provide justification for the use of this database over using more current data (e.g., Sandia database "FIREDATA," or EPRI fire events database). In your justification, please indicate how the analyses ensured that no vulnerabilities were overlooked by the use of the ANI database.

##### 3. WALKDOWN TEAM COMPOSITION

Section C.3.2 of Appendix C, NUREG-1407 requests the licensee to provide a "summary of the walkdown findings and a concise description of the walkdown team." Please provide the composition of the walkdown team, a summary of the scope of the walkdowns, and a summary of the findings.

##### 4. FIRE SUPPRESSION AND TREATMENT OF SUPPRESSION INDUCED DAMAGE TO EQUIPMENT

Section C.3.6 of Appendix C, NUREG-1407 requests the licensee to specifically address the fire growth and spread, including the treatment of suppression induced damage to equipment. Please provide a description of the methodology for assessing the effects of fire suppression agent damage on equipment within the same fire zone, a summary of your assessment criteria, walkdown results, and a description of any modifications that have been implemented to reduce the potential for suppression induced damage.

##### 5. FAILURE RATES OF FIRE SUPPRESSION

Section C.3.7 and C.3.8 of Appendix C, NUREG-1407 request the licensee to specifically address the fire damage modeling and the treatment of detection and suppression. Please identify your source of data and methodology used for determining the failure frequencies for all fire detection and suppression systems and equipment.

## Seismic Analysis

### 6. PLANT CHANGES

Section 3.1.2 of NUREG-1407 provides guidance on the use of an existing seismic PRA to address the seismic IPEEE, which states that the model used in the PRA should represent the current as-built and as-operated condition of the plant. Please discuss whether changes have occurred in any plant hardware or procedures since the previous submittal of the MP3 PSS that may have impact on the IPEEE submittal.

### 7. SEISMIC PRA ENHANCEMENT (3.1.2 REVIEW OF PLANT INFORMATION AND WALKDOWN)

Section 3.1.2 of NUREG-1407 provides guidance on the enhancements regarding certain deficiencies that should be included in the seismic IPEEE when an existing seismic PRA was used. Appendix C, Section C.2.1 requests the licensee to describe the sensitivity studies related to these deficiencies. Please provide a discussion on each of the seven deficiencies (identified in Section 3.2.1 of NUREG-1407) and how they were resolved in the seismic IPEEE.

### 8. USI A-45 AND GI-131 (3.2 USI A-45, GI-131, AND OTHER SEISMIC SAFETY ISSUES)

Section 6.3.3 of NUREG-1407 requests the licensee to specifically address USI A-45 and GI-131 as part of the seismic IPEEE. Please provide a discussion describing how these two issues were addressed including a discussion on how the issues were resolved during the seismic IPEEE. Appendix C, Section C.2.2.7 of NUREG-1407 requests the licensee to document in their IPEEE submittal "the basis and assumptions used to address these issues and a discussion of the findings and conclusions. Evaluation results and potential improvements associated with the decay heat removal function and movable in-core flux mapping system ... should also be highlighted." Please include discussion regarding these items in your response.