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 GENERIC STEAM GENERATOR TUBE RUPTURE (SGTR) ANALYSIS (TAC NO. M83307)

In our review of your Millstone Unit 3 SGTR submittal of April 28, 1992, 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:

9404190366 940413 PDR ADOCK 05000423 PDR

Enclosure: Request for Additional Information

cc w/enclosure: See next page

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

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## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 13, 1994

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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

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## REQUEST FOR ADDITIONAL INFORMATION

1. By letter dated April 28, 1992, you provided the assumed operator action times for the overfill scenario.

You indicated that 17 simulation runs were completed with 11 of 12 Millstone Unit 3 crews of licensed personnel. You derived the arithmetic mean for operator action times, which were used as the assumed times for the overfill scenario.

Using the arithmetic mean as the assumed time does not allow acceptable demonstration that operators can meet the assumed time. Show that operator action times assumed in the SGTR analysis are realistic and achievable.

2. We determined that the percentage of the 17 demonstration runs that met the assumed times for SGTR operator actions were as follows: (1) identify and isolate ruptured SG (65 percent), (2) initiate cooldown (65 percent), (3) initiate depressurization (59 percent), and (4) initiate SI termination (65 percent). These results are unacceptable to show that the postulated SGTR accident can be mitigated within a period of time compatible with overfill prevention, using design basis assumptions regarding available equipment and its impact on operator action times.

In past SGTR reviews, we have found the following actions acceptable for resolving this issue: (1) providing demonstrated times that are bounded by the assumed times, (2) modifying operator action times assumed in the SGTR analysis, or (3) addressing demonstrated times that are not bounded by the assumed times by performing a sensitivity analysis (i.e., using the longest time for a particular operator action), indicating that there is sufficient margin to steam generator overfill. Submit for review your proposed action and schedule to resolve this issue.