



April 14, 1994

Docket No. 50-423
B14745

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Response Times for the Reactor Trip System and
Engineered Safety Features Actuation System Instrumentation
Additional Information (TAC No. 82949)

By letter dated February 10, 1992,⁽¹⁾ Northeast Nuclear Energy Company submitted a proposed license amendment request to the Staff that would remove two tables from the Millstone Unit No. 3 Technical Specifications that list the response times for the reactor trip system (RTS) instrumentation and engineered safety features (ESF) actuation system instrumentation. These two tables would be relocated in the Millstone Unit No. 3 Technical Requirements Manual (TRM) (i.e., Operating Procedure OP-3273, Technical Requirements — Supplementary Technical Specifications). A change to the Millstone Unit No. 3 TRM will require a 10CFR50.59 evaluation. The requirements to periodically measure these response times would remain in the Technical Specifications.

On December 29, 1993,⁽²⁾ the NRC issued Generic Letter 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits." Generic Letter 93-08 provides guidance for requesting a license amendment to relocate tables of instrument response time limits from the technical specifications. In a discussion with the Staff on February 3, 1994, it was determined that some additional administrative clarification to our February 10, 1992, amendment request is warranted in order to be consistent with the guidance provided in the Generic Letter. The following clarification has been added:

- (1) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Proposed Revision to Technical Specifications, Response Times for the Reactor Trip System and Engineered Safety Features Actuation System Instrumentation," dated February 10, 1992.
- (2) L. J. Callan letter to All Holders of Operating Licenses for Nuclear Power Reactors, "Relocation of Technical Specification Tables of Instrument Response Time Limits (Generic Letter 93-08)," dated December 29, 1993.

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ADD

- 4.3.1.2 — Add a statement that the neutron detectors and speed sensors are exempt from response time testing. This exception is currently reflected on Table 3.3-2.
- Bases 3/4.3.1 and 3/4.3.2 — Add a statement that any changes to the RTS and ESF response times shall be made in accordance with Section 50.59 of 10CFR50 and approved by the Plant Operations Review Committee. This is consistent with the guidance provided by the Commission in its "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," issued on July 22, 1993,⁽³⁾ and our September 24, 1993,⁽⁴⁾ submittal for removal of component lists from the technical specifications.


Enclosed herewith as Attachment 1 is a complete set of marked-up technical specification pages for the requested amendment. Attachment 2 contains the retyped technical specification pages. These pages reflect the most current technical specifications for Millstone Unit No. 3. It should be noted that the significant hazards consideration discussion previously included in the February 10, 1992, amendment request remains valid for the two additional changes discussed in this submittal.

We believe the above information, coupled with the information provided in our February 10, 1992, submittal provides a complete basis for approval of the requested amendment. Should the Staff require any additional information, please contact R. G. Joshi at (203) 665-3844.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: 
E. A. DeBarba
Vice President

cc: See Page 3

(3) 58 Federal Register 39132.

(4) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Removal of Component Lists from Technical Specifications," dated September 24, 1993.

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cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3

Mr. Kevin T.A. McCarthy, Director
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
P.O. Box 5066
Hartford, CT 06102-5066

Subscribed and sworn to before me

this 14th day of April, 1994

Beth J. Dietrich

Date Commission Expires: 3/31/95