

Northeast
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

April 18, 1994

Docket No. 50-423
B14635

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
Area Temperature Monitoring Surveillance Requirements

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License NPF-49, by incorporating the change identified in the Attachments into the Technical Specifications of Millstone Unit No. 3.

Description of Proposed Change

The proposed change to Surveillance Requirement 4.7.14 will revise the current frequency at which area temperature monitoring is verified. Specifically, the proposed change will revise the current surveillance frequency which verifies area temperature limits at least once per 12 hours. The revised surveillance requirement will verify area temperature limits at least once per 7 days when the data-logger alarm is operable, or at least once per 12 hours when the data-logger alarm is inoperable.

The frequency for verifying area temperature monitoring for the condition of an inoperable data-logger alarm function is consistent with the current surveillance requirement. Currently, surveillance is required once every 12 hours regardless of whether or not the data-logger alarm function is operable. Therefore, the proposed change retains the current surveillance requirement for the condition of an inoperable data-logger alarm function.

The proposed change in effect, places an operability requirement on the data-logger alarm function by requiring the alarm to be operable in order to relax the surveillance frequency. Also, the alarm function is based on a continuous monitoring of area temperatures. Therefore, it would be expected that a temperature

ADD 1

excursion would be detected by the data-logger alarm function before the current surveillance which does not credit operability of the data-logger alarm function. In addition, the area temperature monitoring system is a continuous on-line data acquisition system and temperature data is always available regardless of the surveillance frequency and/or data-logger alarm operability. The Millstone Unit No. 3 Operations Department utilizes a personal computer in the control room to retrieve information from a data acquisition system to verify area temperature limits. This system uses a software program which is controlled by a station administrative procedure. An alarm will result if an alarm condition is received while the data is being transmitted. Also, an error message will be displayed on the screen if communication with the data acquisition system is lost. Therefore, the computer alarm is considered to be operable if no error message is displayed. A revision to the surveillance procedure will be processed to require that, once per shift, the computer be observed for any error messages. In this manner, if a system problem develops, the alarms can be monitored manually to meet the 12-hour surveillance requirement.

Safety Assessment

Failure of the data-logger alarm function could result in a temperature excursion or malfunction of the data-logger from being noticed for up to a week versus 12 hours under the current surveillance frequency. However, additional measures will be in place to monitor area temperature limits through use of a personal computer in the control room should the alarm become inoperable. Furthermore, this failure would not adversely affect any equipment important to safety presently addressed by the Equipment Qualification Program (EQP). Neither the Technical Specification temperature limit or the EQ limit form the basis for the qualified life of EQ components. The basis for the qualified life of components is determined by the normal maximum average temperature listed in the Final Safety Analysis Report. Therefore, temperature excursions have no significant impact on the qualified life of EQ components. In addition, temperature excursions would not affect any equipment important to safety presently addressed by the EQP which could be called upon during the extended excursion period of up to one week. Equipment important to safety presently addressed by the EQP is qualified to remain functional for conditions in excess of those to be expected during the one week period the data-logger function was not available (i.e., post-accident).

The proposed change relaxes the surveillance frequency for temperature monitoring so that area temperature is required to be monitored once per 7 days when the data-logger alarm function is

operable. NNECO notes that some of these temperatures which are monitored by the data-logger alarm function are used as initial conditions for post-accident environmental profiles. Also, if the environmental profiles used for environmental qualification are exceeded, the failure probability of equipment could be affected. However, the proposed change does not modify these temperature limits. Therefore, the post-accident environmental profiles are unaffected by the proposed changes, and the failure probability of equipment is also unaffected.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed change and has concluded that it does not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed change does not involve an SHC because the change would not:

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

The proposed change reduces the frequency at which area temperature monitoring must be verified when the temperature data-logger alarm function is operable. For conditions where the temperature data-logger alarm function is inoperable, the frequency at which normal ambient temperature is verified remains unchanged. In addition, the proposed change does not affect any system, equipment, or component credited in any previous accident evaluation, any environmental qualification or post-accident profiles. Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change does not alter or affect the design, function, failure mode, or operation of the plant. There is no change to the way in which the plant is operated and, therefore, no increase in the probability of plant operation with any area temperature outside of its limits. Therefore, this change does not create the possibility of a new or different kind of accident from those previously evaluated.

3. Involve a significant reduction in a margin of safety.

The proposed change does not challenge or affect the performance of any of the protective boundaries, revise temperature limits in the technical specifications, or perform any modifications that would increase the likelihood of technical specification temperature limits being exceeded. The proposed change requires the data-logger alarm function to be operable in order to relax the surveillance frequency. This alarm function provides continuous monitoring that would detect temperature excursions prior to the current surveillance which does not credit operability of the data-logger alarm function. Also, the proposed change does not increase the interval for which temperatures could exceed technical specification limits. Therefore, the proposed change does not cause a reduction in the margin of safety.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are considered not likely to involve an SHC. Although the proposed change is not enveloped by a specific example, the proposed change would not involve a significant increase in the probability or consequences of an accident previously analyzed. As previously stated, the proposed change will not affect any system, equipment, or component credited in any previously performed accident analysis. Also, environmental qualification and post-accident profiles are not affected by the proposed change. In addition, the proposed change revises the surveillance requirement to permit an increased surveillance frequency when the data-logger alarm function is operable. For the inoperable data-logger condition, current surveillance requirements are retained.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not involve an SHC, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECC concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

The mark-up of the existing Technical Specifications is contained in Attachment 1. The retype of the proposed change to the Technical Specifications is contained in Attachment 2 and

U.S. Nuclear Regulatory Commission
B14635/Page 5
April 18, 1994

reflects the currently issued version of Technical Specifications.


The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved this proposed amendment and concurs with the above determination.

In accordance with 10CFR50.91(b), we are 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 amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



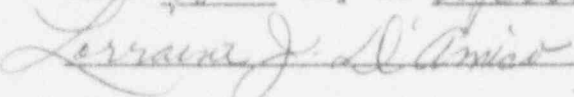
J. F. Opeka
Executive Vice President

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 18 day of April, 1994



Date Commission Expires: 3/31/98