

May 6, 1994

Docket No. 50-423
B14823

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
Reactor Trip System Instrumentation Surveillance
Requirements — Functional Unit 21, Reactor Trip Bypass Breakers

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its operating license No. NPF-49 by incorporating the proposed changes into the Technical Specifications of Millstone Unit No. 3.

Description of the Proposed Changes

The current Millstone Unit No. 3 Technical Specifications require a monthly surveillance operational test of the reactor trip bypass breakers. This is stated in Table 4.3-1, Functional Unit 21. NNECO proposes to modify the monthly operational test of the reactor trip bypass breakers to monthly staggered, such that each breaker is tested every 62 days (i.e., add Note 7 to Functional Unit 21). Also, it is proposed to change the word Breakers in the Functional Unit title to Breaker.

Instituting these proposed changes will make operational testing of the reactor trip bypass breakers consistent with operational testing of the reactor trip breaker by eliminating the requirement to test both bypass breakers during the monthly surveillance, which will also reduce maintenance and surveillance time.

In addition, the following changes are proposed.

Table 3.3-1

Add a note, "(2) Including any reactor trip bypass breakers that are racked in and closed for bypassing a reactor trip breaker," to Functional Unit 18 of Table 3.3-1.

ADD

Base Section 3/4.3.1 and 3/4.3.2 REACTOR TRIP SYSTEM
INSTRUMENTATION and ENGINEERED SAFETY FEATURES ACTUATION SYSTEM
INSTRUMENTATION (Page B3/4 3-2a)

A new paragraph, "Reactor Trip Breakers," is added to Bases Section 3/4.3 Instrumentation to define clearly what constitutes a protection channel. The wording proposed herein is consistent with the Improved Standard Technical Specification (i.e., NUREG-1431).

Safety Assessment

NNECO has reviewed the proposed changes and determined that the proposed changes are safe. The proposed revision to the testing frequency of the reactor trip bypass breakers, staggered monthly as opposed to the current monthly, will not adversely impact the overall reliability of the reactor trip system. The reasons are as follows:

1. Primary reliance for the reactor trip function is on the reactor trip breakers themselves.
2. The reactor trip bypass breakers are relied upon for a relatively short period of time while the reactor trip breakers are tested.
3. Potential common mode failures of the trip breakers/bypass breakers tend to dominate overall system failure probability; the proposed staggered testing will preserve the capability to detect potential common mode failures in a timely manner.

The reduction in maintenance and surveillance testing resulting from the proposed change has a net benefit overall.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed changes and has concluded that they do 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 changes do not involve an SHC because the changes would not:

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

Revising the technical specifications to require a staggered monthly surveillance operational test of the reactor trip

bypass breakers (such that each breaker is tested every 62 days) will only make operational testing of the reactor trip bypass breakers consistent with operational testing of the trip breakers and the automatic trip and interlock logic. It will also reduce cycling of the reactor trip bypass breakers by eliminating the requirement to test both bypass breakers during the monthly surveillance, thereby reducing maintenance and surveillance time. The proposed changes do not affect any of the design basis accidents nor are there any malfunctions associated with these changes.

Additionally, this technical specification bases change only clarifies both the meaning of a reactor trip breaker and trip breaker train which have been included for completeness and clarity concerning the reactor trip breaker system.

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

Revising the technical specifications to require a staggered monthly surveillance operational test of the reactor trip bypass breakers (such that each breaker is tested every 62 days) will only make operational testing of the reactor trip bypass breakers consistent with operational testing of the reactor trip breakers and the automatic trip and interlock logic. There are no new failure modes associated with the proposed changes. Since the plant will continue to operate as designed, the proposed changes will not modify the plant response to the point where it can be considered a new accident.

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

Revising the technical specifications to require a staggered monthly surveillance operational test of the reactor trip bypass breakers (such that each breaker is tested every 62 days) will only make operational testing of the reactor trip bypass breakers consistent with operational testing of the reactor trip breakers and the automatic trip and interlock logic. It will also reduce cycling of the reactor trip bypass breakers by eliminating the requirement to test both bypass breakers during the monthly surveillance, thereby reducing maintenance and surveillance time. The proposed changes do not have any adverse impact on the protective boundaries nor do they affect the consequences of any accident previously analyzed. The surveillance requirements will still ensure that the reactor trip breakers and the reactor trip bypass breakers are tested and within the limits. Therefore, the proposed changes will not

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impact the margin of safety as designated in the bases of any technical specification.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51 FR 7751) of amendments that are considered not likely to involve an SHC. The proposed changes are not specifically covered by the examples provided, but it has been shown that the proposed changes will not increase the probability or consequences of an accident previously evaluated. The proposed revision to the testing frequency of the reactor trip bypass breakers, staggered monthly as opposed to the current monthly, will not adversely impact the overall reliability of the reactor trip system.

The mark-up of the existing technical specifications is contained in Attachment 1. The retype of the proposed changes to the technical specifications are contained in Attachment 2 and reflects the currently issued version of technical specifications.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not increase the type and amounts of effluents that may be released off site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed changes meet the criteria delineated in 10CFR51.22(c)(9) for categorical exclusion from the requirements for an environmental impact statement.

The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved the proposed changes and has concurred 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 the amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

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Should the Staff require any additional information, please contact Mr. R. G. Joshi at (203) 665-3844.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY




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Subscribed and sworn to before me

this 6 day of May, 1994



Lorraine J. Albin

Date Commission Expires: 3/31/98