

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
WOLYESTER WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
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February 15, 1991

Docket No. 50-423BJ3740

Re: 10CFR50.90

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

Reference: E. J. Mroczka letter to the U.S. Nuclear Regulatory Commission, Proposed Revision to Technical Specifications, Cycle 4 Reload Submittal--Boron Dilution Analysis, dated December 4, 1990.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Changes to Technical Specifications
Cycle 4 Reload Submittal-Boron Dilution
Analysis (TAC NO. 77924)

By letter dated December 4, 1990 (Reference), Northeast Nuclear Energy Company (NNECO) submitted a proposed revision to the Technical Specifications for Millstone Unit No. 3. These proposed Technical Specification changes were the result of a boron dilution analysis for Modes 1 through 6 performed for Millstone Unit No. 3 as part of the upgrade to VANTAGE 5H fuel. The results of the analysis and the revised pages of the Technical Specifications were provided in the referenced letter.

Among various Technical Specification changes submitted in the referenced letter, a list of valves (in the chemical and volume control system) is included in Specification 3.4.1.4.2 that requires verification at least once per 31 days that these valves are closed and locked or under administrative controls. The purpose of this requirement is to preclude a boron dilution event in Mode 6 or in Mode 5 when the reactor coolant system water level is drained down to the midplane of the hot leg. During preparation of the implementing procedure for the above listed valves, it was revealed that valve V119 (an air operated valve) is located in a high radiation area. This makes locking and closing Valve V119 per the proposed Technical Specification both difficult and undesirable. Valve V119 (see FSAR Figure 9.3-8, Sheet 2, Coordinates B-4) is the first valve on the inlet to the Boron Thermal Regeneration System (BTRS). As a result, Valve V119 was determined to be one of the valves which should be closed in order to isolate the BTRS from the Chemical and Volume Control System (CVCS) to prevent an inadvertent dilution from the BTRS demineralizers. NNECO proposes isolating Valve V120 (see FSAR Figure 9.3-8 sheet 2, coordinates E-4) in place of Valve V119. Valve V120 is the next valve downstream of valve V119 in the BTRS. Valve V120 is a manual valve which can be easily accessed and locked from outside a high radiation area. As such, Valve V120 is the preferable valve to use to isolate the BTRS from the CVCS. Valve V120 is located downstream of both V119 and the Moderating Heat

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