NORTHEAST UTILITIES

WESTERN MASSACHEISETTS TEEST JO TOM MOLTOSE BATER FORER COMPANY MORTHERT LITETUS SERVICE COMPANY NORTHERT MICE FAR DIS ROLLOWINS General Offices • Selden Street, Berlin, Connecticut

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February 15, 1991

Docket No. 50-423 B13740

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 100. 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 VII9 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 VII9 in the BTRS. Valve VI20 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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U.S. Nuclear Regulatory Commission B13740/Page 2 February 15, 1991

Exchanger. There are no new potential dilution paths introduced between Valve V120 and V119. Closing and locking valve V120 still serves to isolate the BTRS demineralizers from the CVCS on the upstream side of the demineralizers thereby rendering BTRS unavailable for dilution. Therefore, NNECO determined that it is desirable to use valve V120 in place of valve V119. This determination necessitates a change to the Table in Specification 3.4.1.4.2 which was included in our submittal dated December 4, 1990 (Reference).

It should be noted that the above change has no impact on the Safety Assessment and the significant hazards consideration discussion included in the December 4, 1990 letter and the conclusions are still applicable to the above revised change. The revised Technical Specification page is provided in Attachment 1.

We trust the NRC Staff finds this additional information helpful. Should you have any additional questions, please contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

E. J. Mroczka

Senior Vice President

cc: T. T. Martin, Region I Administrator

D. H. Jaffe, NRC Project Manager, Millstone Unit Nos. 1 and 3

W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

Mr. Kevin McCarthy Director, Radiation Control Unit Department of Environmental Protection Hartford, Connecticut 06106

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF WARTFORD

Then personally appeared before me, E. J. Mroczka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

My Commission Expires March 31, 1993

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