

Docket No. 50-245
B15164

Attachment 2

Millstone Nuclear Power Station, Unit No. 1

Proposed Revision to Technical Specifications
Quarterly Surveillance of Containment Isolation Valves

Marked-up Page

March 1995

LIMITING CONDITION FOR OPERATION

3.7 CONTAINMENT SYSTEMS

D. Primary Containment Isolation Valves

1. During reactor power operating conditions, the primary containment isolation valves and primary containment instrument line excess flow check valves shall be OPERABLE except as specified in 3.7.D.2.

SURVEILLANCE REQUIREMENTS

4.7 CONTAINMENT SYSTEMS

D. Primary Containment Isolation Valves

1. The primary containment isolation valves surveillance shall be performed as follows:
 - a. At least once per OPERATING CYCLE, the operable primary containment isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.
 - b. At least once per OPERATING CYCLE, the instrument line excess flow check valves shall be tested for proper operation.
 - c. At least once per quarter;
 - 1) ~~Each normally open power-operated primary containment isolation valve (except for the main steam line power-operated isolation valves) shall be fully closed and reopened.~~
 - 2) ~~With the reactor power less than 75% of rated, trip main steam isolation valves (one at a time) and verify closure time.~~
 - d. At least once per month, the main steam line power-operated isolation valves shall be exercised by partial closure and subsequent reopening.

e. Verify operability of the power operated primary containment isolation valves in accordance with Surveillance Requirement

4.13

Attachment 3

Millstone Nuclear Power Station, Unit No. 1

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Quarterly Surveillance of Containment Isolation Valves

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March 1995

LIMITING CONDITION FOR OPERATION

3.7 CONTAINMENT SYSTEMS

D. Primary Containment Isolation Valves

1. During reactor power operating conditions, the primary containment isolation valves and primary containment instrument line excess flow check valves shall be OPERABLE except as specified in 3.7.D.2.

SURVEILLANCE REQUIREMENTS

4.7 CONTAINMENT SYSTEMS

D. Primary Containment Isolation Valves

1. The primary containment isolation valves surveillance shall be performed as follows:
 - a. At least once per OPERATING CYCLE, the operable primary containment isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.
 - b. At least once per OPERATING CYCLE, the instrument line excess flow check valves shall be tested for proper operation.
 - c. At least once per quarter, with the reactor power less than 75% of rated, trip main steam isolation valves (one at a time) and verify closure time.
 - d. At least once per month, the main steam line power-operated isolation valves shall be exercised by partial closure and subsequent reopening.
 - e. Verify operability of the power operated primary containment isolation valves in accordance with Surveillance Requirement 4.13.

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Attachment 4

Millstone Nuclear Power Station, Unit No. 1

Request for Enforcement Discretion
Quarterly Surveillance of Containment Isolation Valves

March 1995

Northeast Nuclear Energy Company (NNECO) hereby requests the Staff exercise enforcement discretion not to enforce compliance with the surveillance requirements of Section 4.7.D.1.c.1 of the Millstone Unit No. 1 Technical Specifications, should the processing of the requested license amendment not be completed before March 21, 1995. NNECO hereby provides justification for enforcement discretion associated with the above surveillance requirement.

- The Technical Specification Condition that will be Violated

Technical Specification 4.7.D.1.c.1 requires quarterly surveillance testing of containment isolation valves (CIVs). Specifically, the surveillance requires that normally open power operated valves be fully closed and reopened. Four CIVs in the reactor building closed cooling (RBCCW) system cannot be tested safely in this fashion while the unit is in operation. Therefore, the enforcement discretion is only for this surveillance requirement for those four valves.

- The Circumstances Surrounding the Situation Including the Need for Prompt Action

The existing technical specification was approved as License Amendment No. 78 and issued by the Staff on January 10, 1995.⁽¹⁾ That amendment removed the list of CIVs from the technical specifications and simply required that "containment isolation valves" be maintained operable. The purpose of that amendment, as stated in Generic Letter 91-08, is to allow each utility to control the identification of, and requirements for, the plant's CIVs. At Millstone Unit No. 1, a controlled list of CIVs has been developed and is contained in the Technical Requirements Manual (TRM). During the development of this manual, several additional CIVs which were not addressed in the technical specification list were identified and added to the TRM list. However, on March 13, 1995, it was identified that four valves in the RBCCW system could not be closed during power operation without a significant risk of a plant scram and emergency core cooling system (ECCS) actuation. These four valves are not newly identified CIVs; they have been included in the Appendix J test program and IST

(1) J. W. Andersen letter to J. F. Opeka, "Issuance of Amendment (TAC No. M90148)," dated January 10, 1995.

program since their installation during the 1989 refueling outage.

The IST program identified these valves as untestable at power, and has obtained a cold shutdown justification. This is documented in correspondence dated January 8, 1992,⁽²⁾ and February 18, 1993.⁽³⁾

These four valves were last tested by the IST program on November 27, 1994. The maximum surveillance interval which now applies is 125% of the 92 day interval. This period expires on March 21, 1995. At that time, consistent with our understanding of operability requirements, NNECO can no longer affirm that the valves are in literal compliance with this section of the technical specifications. This submittal includes an emergency license amendment request. However, should the Staff be unable to process and approve that request before March 21, 1995, NNECO could be forced into an unscheduled shutdown to stroke the four valves. Therefore, enforcement discretion is necessary to allow continued operation until the amendment requested herein is approved.

• Safety Basis of the Request

The current operability of the valves in the RBCCW system is not being questioned. These valves are included in and tested by the IST program. These valves have all demonstrated acceptable performance during past tests.

These valves have a proven performance history and a testing process that ensures they are operable. The license amendment combined with the inclusion of these valves as technical specification controlled CIVs has imposed a new surveillance requirement which cannot be reasonably applied to these valves while at power.

(2) J. F. Stolz letter to J. F. Opeka, "Inservice Testing Relief Requests (TAC No. M74775)," dated January 8, 1992.

(3) J. F. Stolz letter to J. F. Opeka, "Inservice Testing Program -- Relief requests for Pumps and Valves (TAC No. M84917)," dated February 18, 1993.

• Compensatory Measures

There are no compensatory measures that may be applied other than performing a plant shutdown and testing these four valves. Because an approved testing methodology exists which has demonstrated the operability of these valves, NNECO believes forcing the plant to shutdown and restart is unnecessary and less safe than continued plant operation.

The enclosed license amendment request will link the surveillance requirements for these (and all power operated containment isolation valves) to the IST program. The IST program is controlled and maintained by section 4.13 of the Millstone Unit No. 1 Technical Specifications.

• Duration of the Request

This enforcement discretion need remain valid only until issuance of the license amendment requested herein.

• Basis for No Significant Hazards Consideration

The basis for the enforcement discretion not involving an SHC is the same as discussed for the proposed license amendment.

• Basis for no Irreversible Environmental Consequences

The requested enforcement discretion involves no environmental consequences. The proposed change does not result in a reduction of a margin of safety, does not effect the calculated doses, and does not affect the capability of the systems to perform their intended function to ensure containment isolation occurs. The enforcement discretion essentially allows Millstone Unit No. 1 to operate under the proposed surveillance requirements until such time as the new requirements have been approved by the Staff. Thus, the enforcement discretion does not impact the public health and safety.

• Safety Review

The Millstone Unit No. 1 Plant Operations Review Committee and the Nuclear Safety Assessment Board have concurred with this request for enforcement discretion.

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● Additional Information

Additional information has been supplied throughout the text of this submittal.

In summary, the proposed enforcement discretion would permit Millstone Unit No. 1 to continue to operate at 100% power until the proposed license amendment is issued. This request is safe, and does not constitute an SHC.