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General Offices . Selden Street, Berlin, Connecticut

P.O. BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203) 666-6911

May 17, 1984

Docket No. 50-423 B11180

Director of Nuclear Reactor Regulation Attn. Mr. B. J. Youngblood, Chief Licensing Branch No. 1 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

- References: (1
 - B. J. Youngblood to W. G. Counsil, Request for Additional Information for Millstone Nuclear Power Station, Unit No. 3, dated January 16, 1984.
 - (2) B. J. Youngblood to W. G. Counsil, Request for Additional Information for Millstone Nuclear Power Station, Unit No. 3, dated May 31, 1983.
 - (3) W. G. Counsil to B. J. Youngblood, Submittal of Revised Responses to PSB Mechanical Series Questions, dated April 6, 1984.
 - (4) W. G. Counsil to B. J. Youngblood, Summary/Submittal of Revised Responses to PSB Mechanical Series Questions, dated May 8, 1984.

Gentlemen:

8405310086 8405 PDR ADOCK 05000

Millstone Nuclear Power Station, Unit No. 3 Summary/Submittal of Revised Responses to PSB Mechanical Series Questions

Enclosure 3 of Reference (1) requested additional information on many of the responses to questions asked in Reference (2). Reference (3) and (4) provided a portion of the requested additional information. Attached is a status of all requested information within Enclosure 3 of Reference (1) as discussed during our April 25, 1984 meeting with the PSB Mechanical reviewer. Additionally, all remaining revised responses, as indicated within the status listing, are attached along with any corresponding FSAR back-up pages.

If you have any questions, please contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL By Northeast Nuclear Energy Company Their Agent

W. G. Counsil

Senior Vice President

STATE OF CONNECTICUT) ss. Berlin COUNTY OF HARTFORD

Then personally appeared before me W. G. Counsil, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing ...formation in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Jarrami J. Damico

My Commission Expires March 31, 1988

Attachment

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Status of PSB Mechanical Requests for Additional Information

Question	Status	Remarks
430.57	Closed	Submitted in Reference 1
430.58	Closed	Submitted in Reference 2
430.59	Closed	Submitted in Reference 2
430.60	Open	Attached
430.61	Closed	Submitted in Reference 2
430.62	Open	Attached
FP-11	Open	Attached
430.63	Closed	Submitted in Reference 2
430.64	Closed	Submitted in Reference 2
430.66	Open	Attached
430.67	Closed	Submitted in Reference 1
430.68	Closed	Submitted in Reference 1
430.70	Closed	Submitted in Reference 1
430.71	Closed	Submitted in Reference 1
430.73	Open	Attached
430.74	Closed	Submitted in Reference 2
430.76	Open	Attached. Submitted in Reference 1
430.77	Closed	Submitted in Reference 2
430.79	Reviewer Undecided	Submitted in Reference 1
430.83	Open	Attached
430.84	Open	Attached
430.85	Open	Attached
430.87	Closed	Submitted in Reference I
430.88	Reviewer Undecided	Attached
430.94	Closed	Submitted in Reference 1
430.99	Closed	Submitted in Reference 2
430.100	Closed	Submitted in Amendment 6
430.102	Reviewer Undecided	Submitted in Reference 2
430.103	Closed	Submitted in Reference 1
430.105	Reviewer Undecided	Submitted in Reference 2
430.107	Open	Attached. Submitted in Reference 1.
430.108	Closed	Submitted in Reference 1
430.109	Open	Submitted in Reference 1.
430.111	Closed	Submitted in Reference 1
430.114	Open	Attached
430.118	Closed	Submitted in Reference 1
430.121	Closed	Submitted in Reference 1
430.122	Closed	Submitted in Reference 1
430.124	Closed	Submitted in Amendment 6
430.127	Closed	Submitted in Reference 1
430.128	Closed	Submitted in Reference 2
430.129	Closed	Submitted in Reference 2
430.131	Open	Attached
ASB 15	Open	Attached

Status	Remarks
Open	Attached
Open	Attached
Closed	Submitted in Reference 1
Closed	Submitted in Amendment 5
Closed	Submitted in Reference 1
	Open Open Closed Closed

Reference (1) W. G. Counsil to B. J. Youngblood, Submittal of Revised Responses to PSB Mechanical Series Questions, dated April 6, 1984.

⁽²⁾ W. G. Counsil to B. J. Youngblood, Summary/Submittal of Revised Responses to PSB Mechanical Series Questions, dated May 8, 1984.

Attachment

.

Status of PSB Mechanical Requests for Additional Information

Question	Status	Remarks
430.57	Closed	Submitted in Reference 1
430.58	Closed	Submitted in Reference 2
430.59	Closed	Submitted in Reference 2
430.60	Open	Attached
430.61	Closed	Submitted in Reference 2
430.62	Open	Attached
FP-11	Open	Attached
430.63	Closed	Submitted in Reference 2
430.64	Closed	Submitted in Reference 2
430.66	Open	Attached
430.67	Closed	Submitted in Reference 1
430.68	Closed	Submitted in Reference 1
430.70	Closed	Submitted in Reference 1
430.71	Closed	Submitted in Reference 1
430.73	Open	Attached
430.74	Closed	Submitted in Reference 2
430.76	Open	Attached. Submitted in Reference 1
430.77	Closed	Submitted in Reference 2
430.79	Reviewer Undecided	Submitted in Reference 1
430.83	Open	Attached
430.84	Open	Attached
430.85	Open	Attached
430.87	Closed	Submitted in Reference 1
430.88	Reviewer Undecided	Attached
430.94	Closed	Submitted in Reference 1
430.99	Closed	Submitted in Reference 2
430.100	Closed	Submitted in Amendment 6
430.102	Reviewer Undecided	Submitted in Reference 2
430.103	Closed	Submitted in Reference 1
430.105	Reviewer Undecided	Submitted in Reference 2
430.107	Open	Attached. Submitted in Reference 1.
430.108	Closed	Submitted in Reference 1
430.109	Open	Submitted in Reference 1.
430.111	Closed	Submitted in Reference 1
430 114	Open	Attached
430.118	Closed	Submitted in Reference 1
430.121	Closed	Submitted in Reference 1
430.122	Closed	Submitted in Reference 1
430.124	Closed	Submitted in Amendment 6
430.127	Closed	Submitted in Reference 1
430.128	Closed	Submitted in Reference 2
430.129	Closed	Submitted in Reference 2
430.131	Open	Attached
ASB 15	Open	Attached

Status	Remarks
Open	Attached
Open	Attached
Closed	Submitted in Reference 1
Closed	Submitted in Amendment 5
Closed	Submitted in Reference 1
	Open Open Closed Closed

Reference (1) W. G. Counsil to B. J. Youngblood, Submittal of Revised Responses to PSB Mechanical Series Questions, dated April 6, 1984.

> (2) W. G. Counsil to B. J. Youngblood, Summary/Submittal of Revised Responses to PSB Mechanical Series Questions, dated May 8, 1984.

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NRC Letter: May 31, 1983 1.9

Question 0430.60 (Section 9.5.2)

The information regarding the onsite communications system 1.13 (Section 9.5.2) does not adequately cover the system capabilities 1.14 during transients and accidents. Provide the following information: 1.15

- (a) Identify all working stations on the p'ant site where it may 1.17 be necessary for plant personnel to communicate with the 1.18 control room or the emergency shutdown panel during and/or following transients and/or accidents (including fires) in 1.19 order to mitigate the consequences of the event and to attain a safe cold plant shutdown.
- (b) Indicate the maximum sound levels that could exist at each 1.20 of the above identified we king stations for all transients 1.21 and accident conditions.
- (c) Indicate the type of communication systems available at each 1.22 of the above identified working stations.
- (d) Indicate the maximum background noise level that could exist 1.23 at each working station and yet reliably expect effective 1.24 communication with the control room using:
 - 1. The page party communications systems
 - Any other additional communication system provided that 1.27 working station.
 - e) Describe the performance requirements and tests that the 1.29 above onsite working stations communications systems will be 1.30 required to pass in order to be assured that effective communication with the control room or emergency shutdown panel is possible under all conditions. 1.31
- (f) Discusss the protective measures taken to assure a 1.32 functionally operable onsite communication system. The 1.33 discussion should include the considerations given to component failures. loss of power, and the severing of one or more communication lines or trunks as a result of an 1.34 accident or fire, and the areas where the radic commumnication systems cannot be used due to interference 1.35 with control and instrumentation.

Response:

a. Table Q430.60-1 presents the plant site work stations where it 1.39 may be necessary for plant personnel to be stationed following 1.40 transients and/or accidents (including fires) in order to mitigate the consequences of the event and to achieve cold 1.41

shutdown.

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1.12

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Table Q430.60-2 presents other plant areas where it may be 1.43 necessary for plant personnel to perform specific event-related 1.44 tasks.

The sound-powered telephone system is provided for fire fighting 1.45 communication as discussed in Section 7.7 of the Fire Protection 1.46 Evaluation Report.

b. Table Q430.60-3 presents the estimated maximum sound level that 1.48 could exist at the work stations which are identified in 1.49 Table Q430.60-1.

Table Q430.00-4 presents the estimated maximum sound level that 1.51 could exist at task areas (specific event-related tasks) which 1.52 are identified in Table Q430.60-2.

c. Table Q430.60-1 also identifies the communication systems 1.54 available at the work stations.

Table Q430.60-2 also identifies the communication systems 1.56 available at the task areas (specific event-related tasks).

d. Table Q430.60-5 presents the estimated maximum background noise 1.58 level that could exist at the work stations identified in 1.59 Table Q430.60-1 and yet reliably expect effective communication.

Table Q430.60-6 presents the estimated maximum background noise 2.1 level that could exist at the task areas (specific event-related 2.2 tasks) identified in Table Q430.60-2 and yet reliably expect effective communication.

e. Precore hot functional testing will verify the operation of the 2.4 sound-powered telephone system, voice paging system, and 2.5 evacuation alarms at ambient noise levels throughout the plant.

Preoperational testing of the sound-powered telephone system, 2.7 maintenance jack system, plant switching network, and voice 2.8 paging system will verify that effective communications can be established from all work stations and task areas.

Where effective communication is not established during the above 2.9 testing, appropriate corrective action will be taken. Corrective 2.11 action may include but is not limited to, addition of acoustical barriers (i.e., booths) or relocation of communication equipment 2.12 to achieve effective communication.

f. The plant switching network is powered from a normal ac source. 2.14 Standby power is available from the plant switching network's 2.15 dedicated battery charger system.

The voice paging system and the maintenance jack system are 2.17 powered from a nonvital bus which ultimately is fed from a Class IE motor control center via battery charger-5 (refer to 2.18 FSAR Figure 8.3-2). The battery charger is seismically qualified 2.19

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and mounted, and is located in the Class 1E control building. elevation 4 ft-6 in. (refer to FSAR Figure 8.3-1, Sheet 1 of 4). 2.20

The sound-powered telephone system is self-powered.

The main control room is also equipped with a radio control 2.22 console. The radio control console is powered from the above 2.23 referenced nonvital bus. This console is hard wired to an onsite 2.24 repeater station (including antenna). This feature allows 2.25 communication between the control room and onsite hand-held radios. Preoperational testing will identify those locations 2.26 onsite where hand-held radio communication will be prohibited due to radio frequency interference with control and instrumentation. 2.27

The integrated design of the communication system provides 2.28 adequate communication, from onsite power sources, for firefighting and control and maintenance of safety-related 2.29 equipment. The integrated design is comprised of separate and 2.30 independent systems. Component failures in one of these systems 2.31 will have limited effect on that system and no effect on the other systems. Loss of offsite power would have limited effect 2.32 on communication capabilities due to the interconnection with the Class IE motor control center. Severing of one communication 2.34 line or trunk in a localized plant area will have limited effect on that system and no effect on the other systems. 2.35

A fire or accident in the purple switchgear room or the purple 2.36 cable tunnel may impact the capability of utilizing the voice 2.37 paging system, the maintenance jack system, the sound-powered telephone system, and portions of the plant switching network. 2.38 For a fire or accident in either of these two areas, cold 2.39 shutdown can be achieved by operator action from the main control 2.40 room only. If communication is required, hand-held portable 2.41 radios will be utilized.

A fire or accident in any other localized plant area, such that 2.42 more than one line or trunk is severed in that localized plant 2.43 area, will not impact the capability of the integrated communication system to provide effective communication between 2.44 plant personnel.

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u12179fsr2707 03/30/84

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TABLE 0430.60-1

WORK STATIONS/COMMUNICATION SYSTEMS

	Plant	Voice		Sound Powered	1.14	RADIO
Work Station	Switching Network	Paging System	Maintenance Jack System	Telephone System	1.16	System
Main Control Room	Yes	Yes	Yes	Yes	1.19	YES(1)
Auxiliary Shutdown Panel ⁽²⁾	Yes	Yes	Yes	Yes	1.21 1.22	No
Emergency Generator Control Panel ⁽³⁾	Yes	Yes	Yes	Yes	1.24 1.25	YES

MOTES :

1. The radio control console is also located in the main control 1.31 room.

 The auxiliary shutdown panel is located in the purple switchgear 1.32 room.

 The emergency generator control panels are located in the 1.33 respective emergency generator rooms.

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TABLE 0430.60-2

TASK AREAS/COMMUNICATION SYSTEMS

àrea	Plant Switching Network	Voice Paging System	Maintenance Jack System	Sound Powered Telephone System	1.14 1.15 1.16 1.17	RADIC
Switchgear Room (0) ⁽¹⁾	No(3)	Yes	Yes	Yes	1.19	No
Switchgear Room (P)(1)	Yes	Yes	Yes	Yes	1.21	No
Emergency Generator (0)	Yes	Yes	Yes	Yes	1.23	YES
Emergency Generator (P)	Yes	Yes	Yes	Yes	1.25	YES
Auxiliary Building (4 ft-6 in.)	Yes	ïes	Yes	-No (6 M)	1.40 1.41	YES
Auxiliary Building (24 ft-6 in.)	Yes	Yes	Yes	Yes	1.43	YES
MCC and Rod Control Room (24 ft-6 in.) (0)	Nd(4)	Yes	Yes	No(6a)	1.46	YES
MCC and Rod Control Room (24 ft+6 in.) (P	Yes	Yes	Yes	No (60)	1.49	YES
Auniliary Euilding 42 ft-6 in.)	Yes	Tes	Ves	No ((c)	1.52	YE 5
Containment(2)	Yes	Yes	Yes	No	1.55	YES
Engineered Safety Features Building				(4)	1.58	
 South Containment Recirculation Pump Cubicle (P) 	Na(5+)	Yes	No	No(1)	2.1 2.2 2.3	16.5
 North Containment Recirculation Pump Cubicle (C) 	No (54)	Vec	No	nd(SH)	2.7 2.8 2.9	YES
 North Residual Heat Removal Heat Ex- changer Cubicle (P) 		Yes	Yes	No(Sa)	2.13 2.14 2.15	VES
 Turbine-Driven Auxiliary Feed- water Pump Cubicle 	No (Sc)	"es	Yes	No (SA)	2.19 2.20 2.21	YES

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TABLE Q430.60-2 (Cont)

Art	24	Plant Switching Network	Voice Paging System	Maintenance Jack System	Sound Powered Telephone System	5	RADIO
•	South Residual Heat Removal Heat Exchanger Cubicle (0)	No (50)	Yes	No (8)	No (SA)	2.25 2.26 2.27 2.28	YES
•	Refueling Water Pump Cubicle	No (Sa)	Yes	Yes	No (Ja)	2.32	YES
•	North Motor-Driven Auxiliary Feedwater Pump Cubicle (0)	Yes	Yes	No (9)	Yes	2.37 1.38 2.39	YES
•	South Motor-Driven Auxiliary Feedwater Pump Cubicle (P)	No (54)	Yes	No (9)	No (Fe)	2.43 2.44 2.45	YES
	Air Conditioning Unit Cubicles (P)	No (Se)	Yes	No	No (E)	2.49	YES
•	Air Conditioning Unit Cubicles (0)	No (Sc)	Yes	tic	No((e)	2.54	YES
	in Steam Valve ilding	Yes	Yes	Tes	No	2.59	YES
	rvice Water Pump Dicles					3.4 3.5	
•	East Service Water Cubicle (P)	Yes	Yes	Yes	Yes	3.7 3.8	YES
•	West Service Water Cubicle (0)	Yes	Yes	Yes	No (7)	3.12	YES
NC	TES :					1.17	
1.	<pre>(0) = Orange Irain (P) = Purple Irain</pre>					3.19 3.20	
2.	Containment also co	ntains the	fuel hand	ling carrier p	hone system.	3,22	
*	vision 1	INSER	TBI	3	May 1984		
Ker		2 0.			119 3 7 2 0 4		

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- 3. Available in adjacent (P) Switchgear Room.
- 4. Available in adjacent (P) MCC and Rod Control Room.
- 5. Available in (O) Motor-Driven Auxiliary Feedwater Pump Cubicle located:
 - a) at the same building elevation
 - b) at the next higher building elevation
 - c) at the next lower building elevation
- 6. Available in Auxiliary Building
 - a) at the same building elevation
 - b) at the next higher building elevation
 - c) at the next lower building elevation
- 7. Available in adjacent (P) Service Water Cubicle.
- 8. Available in adjacent (P) Residual Heat Removal Heat Exchanger Cubicle.
- 9. Available in adjacent Turbine-Driven Auxiliary Feedwater Pump Cubicle.

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TABLE 0430.60-3		1.9
WORK STATIONS/SOUND LEVELS		1.11
Work Station	Estimated Maximum Sound Level (dBA)	1.14
Main Control Room	65	1.18
Auxiliary Shutdown Panel	75	1.19
Emergency Generator Control Panel	100	1.20

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TABLE 0430.60-4	1.9
TASK AREAS/SOUND LEVELS	1.11

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Area	Estimated Maximum Sound Level (dBA)	1.14
Switchgear Room (0) ⁽¹⁾	75	1.16
Switchgear Room (P) ⁽¹⁾	75	1.18
Emergency Generator (0)	100	1.20
Emergency Generator (P)	100	1.22
Aux:liary Building (4 ft-6 in.)	89-94 (97 near air compressor and pipe penetrations)	1.34 1.35 1.36
Auxiliary Building (24 ft-6 in.)	92+94 (97 near pumps)	1.38
MCC and Rod Control Room (24 ft-6 in.) (0)	65	1.41 1.42
MCC and Rod Control Room 24 ft=6 in.) (P)	65	1.44 1.45
Auxiliary Building (43 ft+6 in.)	Note A	1.47 1.48
Containment	Note E	1.50
Engineered Safety Features building		1.53
 South Containment Recircu- lation Pump Cubicle (P) 	93 (96 near pumps)	1.56
 North Containment Recircu- lation Pump Cubicle (0) 	93 (96 near pumps)	2.1 2.2
 North Residual Hest Removal Hest Emphanger Cubicle (P) 	93	2.6 2.2 2.2
 Turbine-Driven Auxiliary Feedwater Pump Cubicle 	97-100	2.12 2.13
 South Residual Heat Removal Heat Exchanger Subicle (0) 	93	2.17 2.15 2.19

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TABLE Q430.60-4 (Cont)

<u>àrea</u>	Estimated Maximum Sound Level (dBA)	
• Refueling Water Pump Cubicle	97-100	2
 North Motor-Driven Auxiliary Feedwater Pump Cubicle (0) 	97-100	22
 South Motor-Driven Auxiliary Feedwater Pump Cubicle (P) 	97-100	13.13
 Air Conditioning Unit Cubicles (P) 	89-90	1111
 Air Conditioning Unit Cubicles (0) 	89-90	2 2
Main Steam Valve Building	95-100	2.
Service Water Pump Cubicles		2.
 East Service Water Cubicle (P) 	91	14 14
• West Service Water Cubicle (0)	91	14.1
		2 .
<pre>. (C) = Orange Train (F) = Purple Train</pre>		0.61

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TABLE Q430.60-4 (Cont)

NCTE A:			3.14
Sound levels	s for various areas in a	uxiliary building, elevation	3.17
43 ft-6 1n.,			
		Estimated Maximum	3.20
Elevation	Area	Sound Level (dBA)	3.21
41 ft-6 in.	East	83 (91 near vacuum pump	3.22
	Sample Room	63	3.24
	MCC Area and Boric Acid	30	3.25
	Tanks		3.26
	Heat Exchanger Cubicle	94	3.27
	North	83-85 (90 by stairway)	3.28
	Panel Room	63	3.29
	N-G Room	75 (86 near M-G)	3.30
NOTE B:			3.34
Sound levels	for various areas in the con	tainment are:	3.37
-)24 ft-	Inner Area, During Outage	<85	3.40
	Outer Area	94 (97 near fans and	3.41
é 15.	Outer Area	compressors)	3.42
	Fan Rooms	101	3.43
	Fan Rooma		
States and States	Reactor Coolant Pumps/	98-102	3.47
2 2 2 201.	Steam Generators		3.48
	Hoist Space	90	3.49
	Fressurizer	91	3.50
	Letdown Heat Exchanger	88	3.51
		90	3.52
	Flatforms Outer Wall	~	
14 55+0 in.	North Area	87	3.56
and the state	Platforms Outer Wall	90	3.57
	Opening Reactor Coolant	98	3.56
	Pump/Steam Generator		3.59
		95	4.2
El fore in.	Main Floor	90-95	4.3
	Flatforms Outer Wall	20.22	

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	TAELE	Q430.60-5	5		1.9	1
WORK STATIC		E COMMUNI((dBA)	CATION SOUND L	EVELS	1.12	1
Work Station	Plant Switching Network	Voice Paging System	Maintenance Jack System	Sound Powered Telepnone System	1.15 1.16 1.17 1.18	RADIO
Main Control Room	81	90	110 (1)	81	1.20	81
Auxiliary Shutdown Fanel	81	90	110(1)	81	1.22	NA
Emergency Generator Control Panel	81	90	110(1)	81(2)	1.25	81(2)
HCTE :					1.28	
1. Double ear-cup he	eadset				1.31	100.5

2. 110 dBA WITH DOUBLE EAR-CUP HEADSET

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TABLE 0430.60-6

TASK AREAS/EFFECTIVE COMMUNICATION SOUND LEVELS (dBA)

				U-		
àrea	Plant Switching Network	Voice Paging System	Maintenance Jack System	Sound Powered Telephone System	1.15 1.16 1.17 1.18	RADIC
Switchgear Room (0)(1)	NA(4)	90	110(2)	81	1.20	NA
Switchgear Room (P)(1)	81	90	110 (2)	81	:.22	NA
Emergency Generator (0)	81	90	110(2)	ô1())	1.24	81(3)
Emergency Generator (P)	81	90	110(2)	81(7)	1.26	81(3)
Auxiliary Building (4 ft-6 in.)	81	90	110(2)	NA (76)	1.41 1.42	e1 (3)
Auxiliary Building	81	90	110(2)	S1 (3)	1.44 1.45	81(3)
NCC and Rod Control Room 124 ft-6 in.) (0)	NA(S)	90	110 - 2 -	NA (7A)	1.47 1.48	13
MCC and Rod Control	81	90	110'2'	NA (7a)	1.50	6(
Auniliary Building 41 ft-6 in.)	81	90	110(2)	NA (7c)	1.53 1.54	E1(3)
Containment (2)	81	90	110(2)	NA	1.56	81(3)
Engineered Safety Features Building					1.59	
 South Containment Recirculation Pump Cubicle (P) 	NA (6 K)	90	NA	NA (EAT	2.4	EI(3)
 North Containment Recirculation Fump Cupicle (0) 	NA (6 4)	90	NA	11A (64)	2.8 2.9 2.10	E1(3)
 North Residual Hea Removal Heat Ex- 	(-)	90	110(2)	na(fa)	2.14 2.15 2.16	E1 (3)
 changer Cubicle P Turbine-Driven Auxiliary Feed- water Pump Cubicle 	NA (Ga) 90	110(2)	NA(69)	2.20 2.21 2.22	81(3)

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TABLE 0430.60-6 (Cont)

	Plant	Voice		Sound	r	RADIO
Area	Switching Network	Paging System	Maintenance Jack System	Telephone System		SYSTEM
 South Residual Heat Removal Heat Exchanger Cubicle (0) 	NA (EA)	90	NA (7)	NA (60)	2.26 2.27 2.28 2.29	81 (3)
 Refueling Water Pump Cubicle 	NA (60)	90	110 . 2 .	NA (64)	2.33 2.34	81(3)
 North Motor-Driven Auxiliary Feedwater Pump Cubicle (0) 	81	90	NA (10)	(2):3	2.38 2.39 2.40	e1(3)
 South Motor-Driven Auxiliary Feedwater Pump Cubicle (P) 	NA (60)	90	NA (10)	NA (64)	2.44 2.45 2.46	e1(3)
 Air Conditioning Unit Cubicles (P) 	NA (6C)	90	NA	NA(EC)	2.50	e1(3)
 Air Conditioning Unit Cubicles (0) 	NA (6 C)	90	NA	NA ((c)	2.55 2.56	e1(3)
Main Steam Valve Building	81	90	110 ⁽²⁾	NA	2.60	E1(3)
Service Water Pump Subicles					2.5 3.6	10
 East Service Water Cubicle (P) 	81	90	110(2)	81(9)	3.8 3.9	81 (3)
 West Service Water Cubicle 0 	81	90	110(2)	NA(8)	3.13 3.14	81(3)
HOTES I					1,18	
<pre>1. (0) = Orange Train (P) = Purple Train</pre>					3.20 3.21	
2. Double ear-cup head	iset	11			1.23	
< I	N SLAT	<u>er</u>				

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- 110 dBA with double ear-cup headset.
- 4. Available in adjacent (P) Switchgear Room.
- 5. Available in adjacent (P) MCC and Rod Control Room.
- 6. Available in (O) Motor-Driven Auxiliary Feedwater Pump Cubicle located
 - a) at the same building elevation.
 - b) at the next higher building elevation.
 - c) at the next lower building elevation
- 7. Available in Auxiliary Building
 - a) at the same building elevation
 - b) at the next higher building elevation
 - c) at the next lower building elevation
- 8. Available in adjacent (P) Service Water Cubicle
- 9. Available in adjacent (P) Residual Heat Removal Heat Exchanger Cubicle.
- 10. Available in adjacent Turbine-Driven Auxiliary Feedwater Pump Cubicle.

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NRC Letter: May 31, 1983 1.9

Plestion 0430.62 (Section 9.5.3)

1.12

1.19

Identify the safety related areas, vital areas, and hazardous areas 1.13 where emergency lighting is needed for safe shutdown of the reactor 1.14 and the evacuation of personnel in the event of a transient or accident. Tabulate the lighting system provided in your design to 1.1 accommodate those areas so identified. Include the degree of 1.1 compliance to Standard Review Plan 9.5.1 regarding emergency lighting requirements in the event of a fire.

Response :

a. Table Q430.62-1 presents the plant site work stations where it 1.20 may be necessary for plant personnel to be stationed following 1.21 transients and/or accidents (including fires) in order to mitigate the consequences of the event and to achieve cold 1.22 situtdown.

Table Q430.62-2 presents other plant areas where it may be 1.24 inecessary for plant personnel to perform specific event-related 1.25 tasks or where access or egress may be required.

The fixed, self-containe, sealed beam battery packs provided 1.26 including individual 8-hour battery power supplies) comply with 1.27 Standard Review Flan 3.5.1, as discussed in Section 7.6 of the Fire Protection Evaluation Report.

b. Table 0430.62-1 also identifies the lighting systems available at 1.29 work stations.

Table 0430.62-2 also identifies the lighting systems available at 1.31 task areas (specific event-related tasks) or where access and 1.32 agress may be required.

c. Table Q430.62-3 presents the lighting levels available at work 1.34 stations.

Table 0430.62-4 presents the lighting levels available at task 1.36 areas (specific event-related tasks) or where access and egress 1.37 may be required.

d. Preoperational testing of the normal ac, essential ac, and 3-hour 1.39 battery pack do systems will verify the lighting levels provided 1.40 or all work stations, task areas, and access and egress paths.

Where lighting levels are not established during the above 1.42 testing, appropriate corrective action will be taken. Corrective 1.43 action may include, but is not limited to, addition or relocation 1.44 of fixtures to provide the minimum footcandle levels.

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e.

The lighting levels presented in Table Q430.62-3 are sufficient to adequately control, monitor, and/or maintain safety-related equipment during accident and transient conditions.

The lighting levels presented in Table Q430.62 A are sufficient for access and egress. These lighting levels are in accordance with the IES Lighting Handbook-1981 Application Volume requirement for access/egress route emergency illumination.

The normal lighting levels presented in Table Q430.62-4 are sufficient for safety. These lighting levels are in accordance with the IES Lighting Handbook-1981 Application Volume Requirements for Lighting for Safety.

Portable battery powered lanterns are available to supplement the fixed lighting when and where required either to perform specific event-related tasks or to perform maintenance on safety-related equipment.

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TABLE	Q430.52-1		1.10

WORK STATIONS/LIGHTING SYSTEMS

1.15 De S-Hr Essential Ac (0) (1) (p)(1) Vork Station Normal Ac Battery Packs 1.13 Tes 1.15 Main Jonerol Room No Tes Yes 1.19 Coerating Area) Autiliary Shutdown Yes No Tes 145 - - -Fanal 2 1.24 Emercency Generator 1.25 Control Panel(3) 1.26 Tes 10. No Yes No 1.27 2) No No Yes Tes 1.29 MOTES : 1.33 1. (0) = Orange Train (?) = Purple Train 1.23 1. The auxiliary shutdown panel is located in the purple switchgear 1.38 room.

 The emergency generator control panels located in the respective local emergency generator rooms.

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TABLE 0430.52-2	1.9
LIGHTING SYSTEMS	1.11
TASKA AREAS (AND) ACCESS AND EGRESS	1.13

<u>Area</u>	Normal Ac	Emergency (0) ¹¹⁷	Ac (2) 11)	Do 8-hr Battery Packs	1.16
Nain Control Room Remaining Area)	Tea	Yes	Tes	Yes	1.19
Switchgear Room (0)	Yes	Yes	No	ïes	1.22
Switchgear Room (P)	Yes	No	Yes	Yes	1.24
Emergency Generator	No	Yes	Nc	2es	1.37 1.38
Emergency Generator	No	No	Yes	Ves	1.40 1.41
Auxiliary Suilding (4 -6")	Yes	Tes	Yes	2es	1,43 1,44
Auxiliary Building (24 +6")	Yes	Tes	Yes	Ves	1.46 1.47
MCC and Rod Control Room (24'-5") (0)	Yes	Yes	No	Yes	1.49 1.50
MCC and Rod Control Room (24'+6") (P)	Yes	No	Yes	Zes	1.52 1.53
Auxiliary Building (43'-6")	Tes	Ves	Yes	Yes	1.55 1.56
Containment	Yes	Yes	Yes	Yes	1.58
Engineered Safety Features Building					2.1 2.2
 South Containment Recirculation Pump Cubicle (P) 	p Yes	No	Yes	Yes	2.4 2.5 2.6
 North Containment Recirculation Pump 					2.10
Cubicle (0)	Yes	Yes	No	Yes	2.12

SHALLWAYD, STAIRWAYS, YES YES YES YES YES YES

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TABLE Q430.62-2 (Cont)

			Emergency	AC	De 3-hr	1
Are	а	formal Ac	(0) 1	(P)(1)	Battery Packs	
						2.16
•	North Residual Heat Removal Heat					2.17
	Exchanger Cubicle	Yes	Zes	Tes	ïes	2.13
	2)		103			2.19
	Turbine-Driven					2.23
	Auxiliary Feed-					. 2.24
	vater Pump Cubi-					2.28
	cle	Yes	Yes	Yes	Tes	2.26
	South Residual Heat					2.30
	Removal Heat					2.31
	Exchanger Cubi-					2.32
	cle (0)	Yes	Yes	Yes	Yes	2.33
	Refueling Water					2.37
	Pump Cubicle	Tes	Yes	Yes	Tes	2.38
	North Motor Driven					2.42
	Auxiliary Feedwater					2.43
	Fump Subicle (0)	Yes	795	Yes	Yes	2.44
	South Motor Driven					2.43
	Auxiliary Feedwater					2.49
	Pump Cubicle (P)	Yes	Tes	Yes	Yes	2.50
	Air Conditioning					2.54
	Unit Cubicles					2.55
	(5)	Yes	No	Yes	Yes	2.56
	Air Conditioning					2.60
	Unit Cubicles					3.1
	(0)	Yes	Yes	No	Yes	3.2
	n Steam Valve					3.6
	lding	Yes	Yes	Yes	Yes	3.7

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TABLE Q430.62-2 (Cont)

Area	Normal Ac	$\frac{\text{Emergency}}{(0)^{(1)}}$	Ac (P)(1)	Do 3-hr Battery Packs	
Service Water Pump Cubicles					3.11 3.12
• East Service Water Cubicle (P) Yes	No	Ves	Yes	3.14 3.15
 West Service Water Cubicle (0) Yes	Yes	No	Yes	2.17 5.18
NOTE :					3.20
1. (0) = Orange Tr (P) = Purple Tr					3.22 3.23

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		MNPS-3 FS	AR		
	T	ABLE 0430.	52-3		1.10
	WORK STAT	IONS/LIGHT	ING LEVELS	1)	1.12
		Estimated	Footcandle	Levels	1.15
	Normal	Essential	. Ac	Dc 3-Hr	1.16
Work Stations	Lighting	(0)(2)	(P)(2)	Battery Packs	1.17
Main Control Room	Note A	Note A	Note A	3 . 3 . (4)	1.19
(perating Area)					1.00
Auxiliary Shutdow	n 20:3)	N/A	10(3)	4 3 (4)	1.25
Fanel					1.23
Emergency Generat	or				1.25
Control Panel					1.25
.01	20'3)	Note B(3)	N/A	4 3 (4)	1.27
(?)			Note C'3		1.27 1.28
NOTES :					:.30
Averäge maint	ained; floo	r level ur	less otherw	vise specified.	1.04
(0) = Orande	Train				1.36
(P) = Purple	Frain				1.38
seeing task a		vertical	L panel or b	board surface, within	1.41
A. 100 footcandl	es - half (0), half ((P); dimmer	controlled.	1.44
B. 20 footcandle	s. all (0).				1.46
2. 20 footcandle	s. all (P).				1.43

GA. PORTABLE BATTERY POWERED LANTERNS ARE AVAILABLE TO SUMPLEMENT THE 8-HR BATTERY MACKS AS REQUIRED.

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TABLE 0430.62-4 1.9

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TASK AREAS AND ACCESS AND EGE

	Normal	Emergency (0)(2)	Ac	Dc 3-hr
<u>àrea</u>	Lighting	(Note E)	(F)	Battery Packs (Note F)
Main Control Room Remaining Area)	20	.75	.75	. 5
Switchgear Room (0)	20	Note A	NA	. 5
Switchgear Room (P)	20	NA	Note A	.5
Emergency Generator	Note C	Note C	NA	. 5
Emergency Generator	Note D	NA	Note D	. 5
Auxiliary Building	20	.75	.75	.5
Auxiliary Building (24'-6")	20	.75	.75	.5
MCC and Rod Control Room (24'-6") (0)	20	Note B	NA	.5
MCC and Rod Control Room (24'-6") (P)	20	NA .	Note B	.5
Auxiliary Building (43'-6")	20	.75	.75	.5
Containment	20	.75	.75	.5
Engineered Safety Features Building				
 South Containment Recirculation Pump Subicle (P) 	20	NA	.75	.5
North Containment Recirculation Pump Cubicle (0)	20	.75	NA	.5

Hallways, Stairways, 20.75.75.5 Revision 1 and Corridons 1 of 3 May 1984

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TABLE 0430.62-4 (Cont)

	Es	vels		
		Emergency	AC	De 8-hr
Area	Normal Lighting	(0)(2) (Note E)	(?):2)	Battery Packs (Note F)
North Residual Heat Removal Heat Exchanger Cubicle (P)	20	.75	.75	.5
Turbine-Driven Auxiliary Feed- water Pump Cubi- cle	20	.75	.75	.5
South Residual Heat Removal Heat Exchanger Cubi- cle (0)	20	.75	.75	.5
Refueling Water Pump Cubicle	20	.73	.75	.5
North Motor Driven Auxiliary Feedwater Pump Cubicle (0)	20	.75	.75	.5
South Motor Driven Auxiliary Feedwater Pump Cubicle (?)	20	.75	.75	.5
Air Conditioning Unit Cubicles (P)	20	.75	.75	. 5
Air Conditioning Unit Cubicles (0)	20	.75	.75	.5
ain Steam Valve uilding	20	.75	.75	.5

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TABLE 0430.62-4 (Cont)

		Estimated Footcandle Levels					
	Area	Normal Lighting	Emergence (O)(2) (Note E)	<u>/ Ac</u> (P)(2)	Dc 3-hr Battery Packs (Note F)		
	milos Water Pump Sicles	20	.75	. 75	.5		
	last Service Vater Subicle P	20	IIA	.75	. 5		
•	West Service Water Cubicle	20	.75	NA	.5		
	23:						
	Average maintaine	d: floor lev	el unless o	therwise s	pecified.		
	<pre>(0) = Orange Train (P) = Purple Train </pre>	n S					
	13.5 footcandles.	20 footcand	les between	switchgea	r bays (front).		
	8.75 footcandles.	15 footcand	les in fron	t of load	centers.		
	24 footcandles, al	L1 (0).					
5.	24 footcandles, al	11 (P). UO	to and	through	the score		
	Along accessingre averages over entr	ess paths, en	scept Notes	A, B, C.	and D which are		
	.75 footcandles al	ong center 1	FIXE	ess and eg ED	ress paths.		

3. PORTABLE BATTERY (POWERAL) LANTERNS ARE AVAILABLE TO SUPPLEMENT EXERTINE LIGHTING WHEN AND WHARE REQUIRED EITHER TO PERFORM SPECIFIC EVENT-RELATED TASHS OR TO PERFORM MAINTENANCE ON SAFETT-RELATED EQUIPMENT.

Revision 1

May 1984

Open Items

Chemical Engineering Branch - Fire Protection

P-11 Emergency Lighting (Draft SER Section 9.5.1.4)

We find that 3.0 12 candles of light for egress routes is not adequate. We will require the applicant to provide 5.0 ft candles of light in all access and egress routes to and from all areas required to be manned for safe shutdown. This is an open item.

Response (4/84)

Refer to a response to

430.62.

NRC QUESITON 4

MNPS-3 FSAR

Question Q430.66 (Section 9.5.3)

You state in Section 9.5.3.2 of the FSAR that the normal dc and essential dc lighting systems provide silhouette level lighting and light at approximately 3 foot candles, which is more than adequate for emergency operation. The staff disagrees with these statements. The staff has determined that a minimum of 10 foot candles at the work station is required to adequately control, monitor, and/or maintain safety related equipment during accident and transient conditions. For those safety related areas listed in requests 430.60 and 430.61 and illuminated by the dc lighting systems only verify that the minimum of 10 foot candles at the work station is being met. Also verify that the 10 foot candles minimum at the work station is being met by those safety related areas illuminated by the ac emergency system. Modify your design as necessary.

Response:

Refer to the revised response to NRC Question 430.62.

Question 430.73 (Section 3.2, 9.5.4, 9.5.5, 9.5.6, 9.5.7, and 9.5.8)

The FSAR text and Table 3.2-1 indicates that the components and piping systems for the diesel generator auxiliaries (fuel oil system, cooling water, lubrication, air starting, and intake and combustion system) that are mounted on the auxiliary skids are designed seismic Category I and are ASME Section III, Class 3 quality to the extent possible. The engine mounted components and piping and certain other components listed in the various sections of 9.5 are designed and manufactured to DEMA standards and/or manufacturer's standards and are seismic Category 3. This is not in accordance with Regulatory Guide 1.26 which requires the entire diesel generator auxiliary systems to be designed to ASME Section III, Class 3 of Quality Group C. You also state that the figures in Section 9.5 show where quality group classification changes are. The figures do not provide this information. Provide the following: (a) the industry standards that were used in the design, manufacture, and inspection of the engine mounted piping and components, (b) show on the appropriate P&ID's where the Quality Group Classification changes from Quality Group C, and where the Seismic Category I portions of the system are located. Sections 9.5.4 through 9.5.8 define certain pumps, filters, strainers, valves, and subsystems in the diesel generator auxiliary systems as Quality Group D or not applicable with regards to Quality Group Classification. It is our position that all components and piping in the diesel generator auxiliary systems be designed to Seismic Category I, ASME Section III, Class 3 requirements. Comply with this position or justify noncompliance.

Response

Regulatory guidance from Regulatory Guide 1.26, Revision 3, Positions C.1 and C.2 was used when determining the quality group classification of the diesel engine and its auxiliary support systems. As noted in the regulatory guide discussion section, "other systems not covered by this guide such as instrument and service air, diesel engine and its generators and auxiliary support systems...should be designed, fabricated, erected and tested to quality standards commensurate with the safety functions to be performed."

The diesel engine and its engine mounted portions of the auxiliary piping are designed to seismic and Category I requirements and follow the guidelines of DEMA standards, which are endorsed by Regulatory Guide 1.9 and IEEE Standard 387.

FSAR FiguresQ430.73-1 through 430.73-4 show the on skid and off skid portions of piping systems and components. All piping and components are designed to seismic and Category I requirements. As can be seen from FSAR Figures Q430.73-1 through Q430.73-4, the piping up to the diesel skid interface is ASME 3, Class 3 for all auxiliary piping. The majority of on skid and engine piping is also ASME 3. Class piping that is not ASME 3, Class 3 is designed to manufacturers standards. The manufacturers standards are listed in Tables 12 and 9.5-13 930 73-7*

TABLE Q430.73-1

DIESEL ENGINE MANUFACTURERS PIPING STANDARDS

AIR STARTING SYSTEM

Working Pressure 450 PSI

Pipe & Fittings Material

OD	Wall Thickness	Material Spec.
2.375	.218	A53
1.9	.145	A12OXS
1.875	.188	MT1020
1.75	.155	A513
.625	.049	A254C1
.375	.049	MT1010

JACKET WATER SYSTEM

Working Pressure 60 PSI

Pipe & Fittings Material

0D	Wall Thickness	Material Spec.
4	.188	MT1018
.375	.095	MT1010

FUEL OIL SYSTEM

Working Pressure 35 PSI

Pipe & Fittings Material

OD	Wall Thickness	Material Spec.
1.5	.120	MT1018
1	.065	MT304
.75	.095	MT1010
.5	.049	MT304
.25	.035	MT304

TABLE Q430.73-1

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DIESEL ENGINE MANUFACTURERS PIPING STANDARDS

LUBE OIL SYSTEM

Working Pressure 120 PSI

Pipe & Fittings Material

Wall Thickness	Material Spec.
.120	MT1018
.25	MT1018
.120	MT1010
.25	MT1018
.156	MT1018
.095	MT1020
.065	MT1010
.049	MT1010
	.120 .25 .120 .25 .156 .095 .065 .065 .065 .065

TURBOCHARGER WATER PIPES

Working Pressure 60 PSI

Pipe & Fittings Material

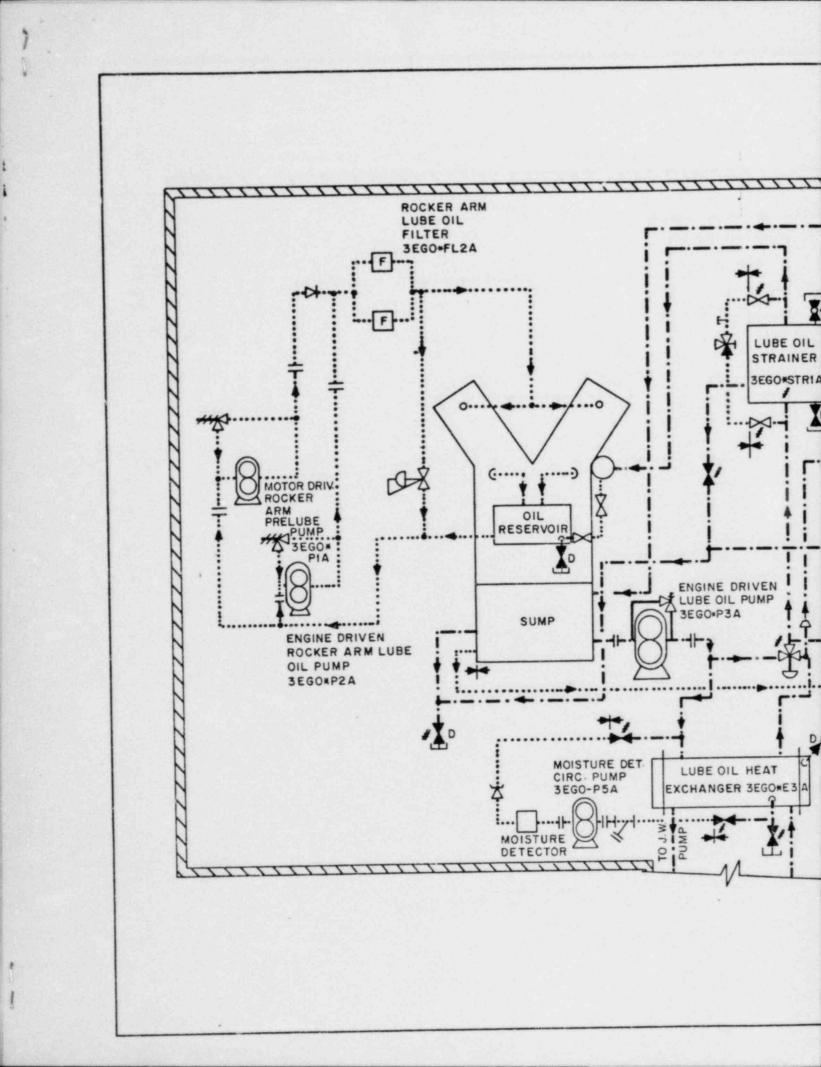
OD	Wall Thickness	Material Spec.
4	.188	MT1018
2.375	.154	A120-S
1.646	.140	A120-5
1.375	.133	A120-J
1	.188	MT1018

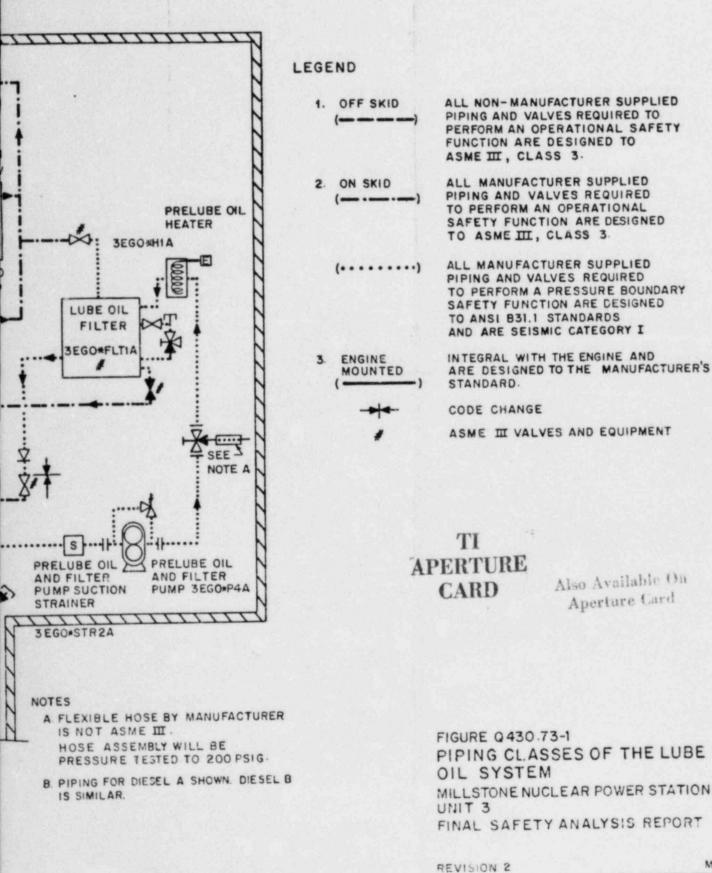
INJECTOR COOLING SYSTEM

Working Pressure 50 PSI

Pipe & Fittings Material

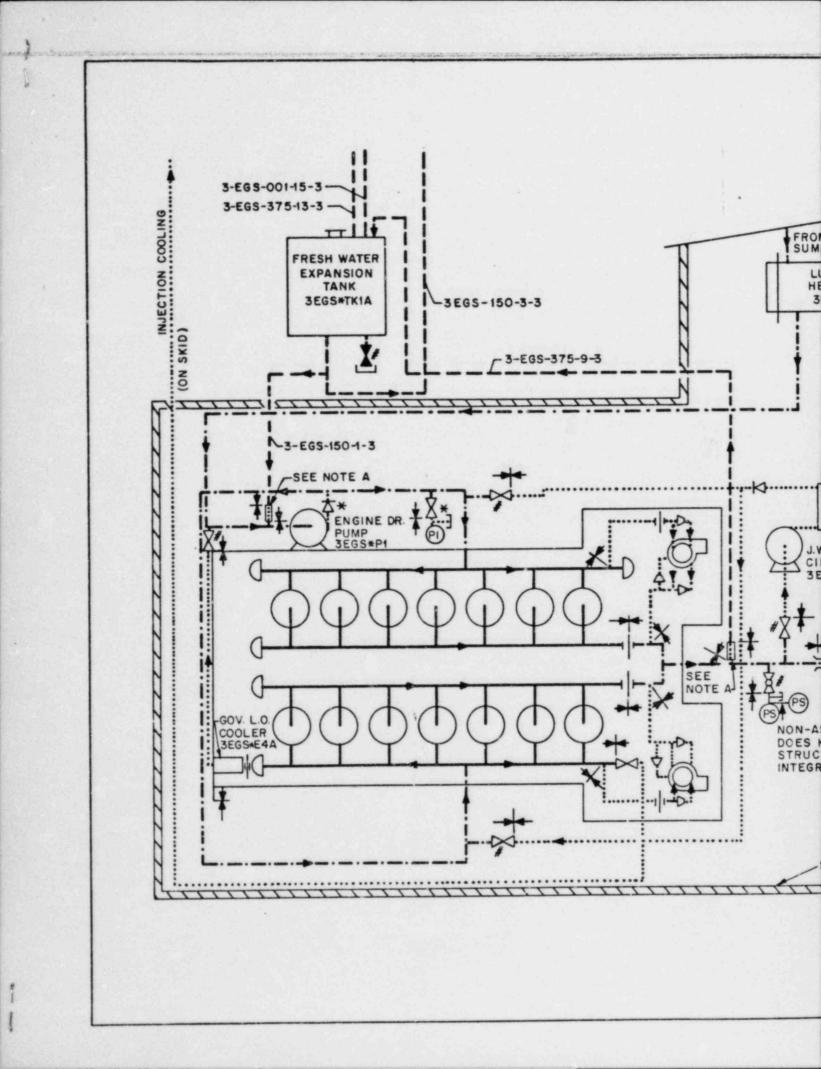
OD	Wall Thickness	Material Spec.
315	.179	A120-S
1.125	.065	MT1010
.376	.065	MT1010

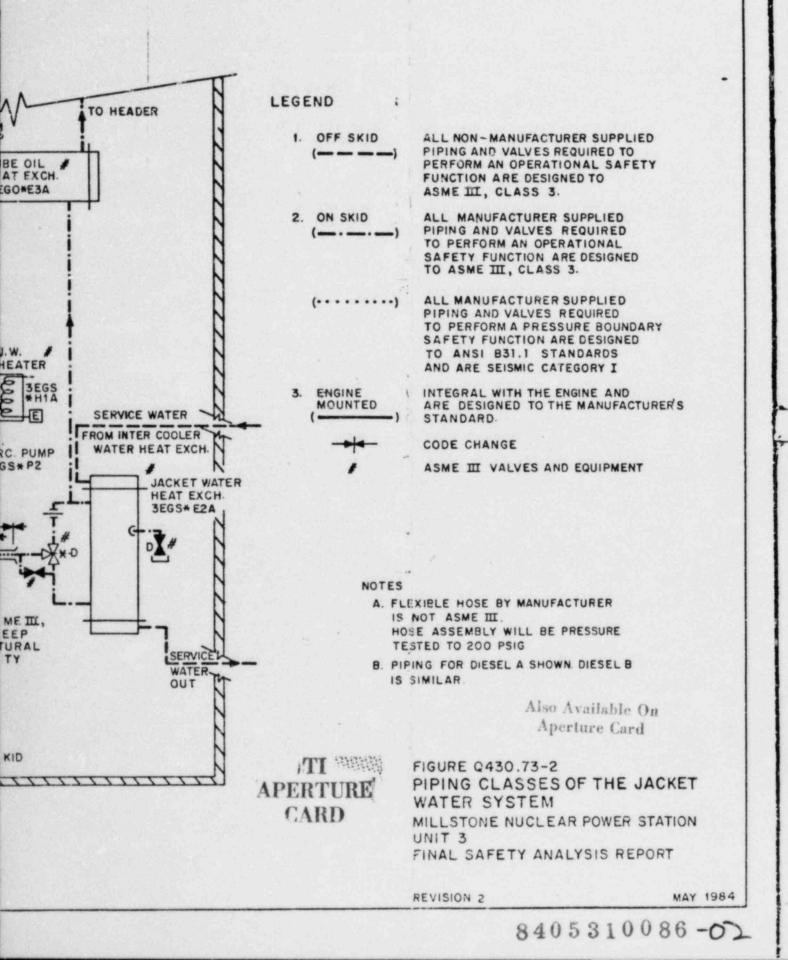


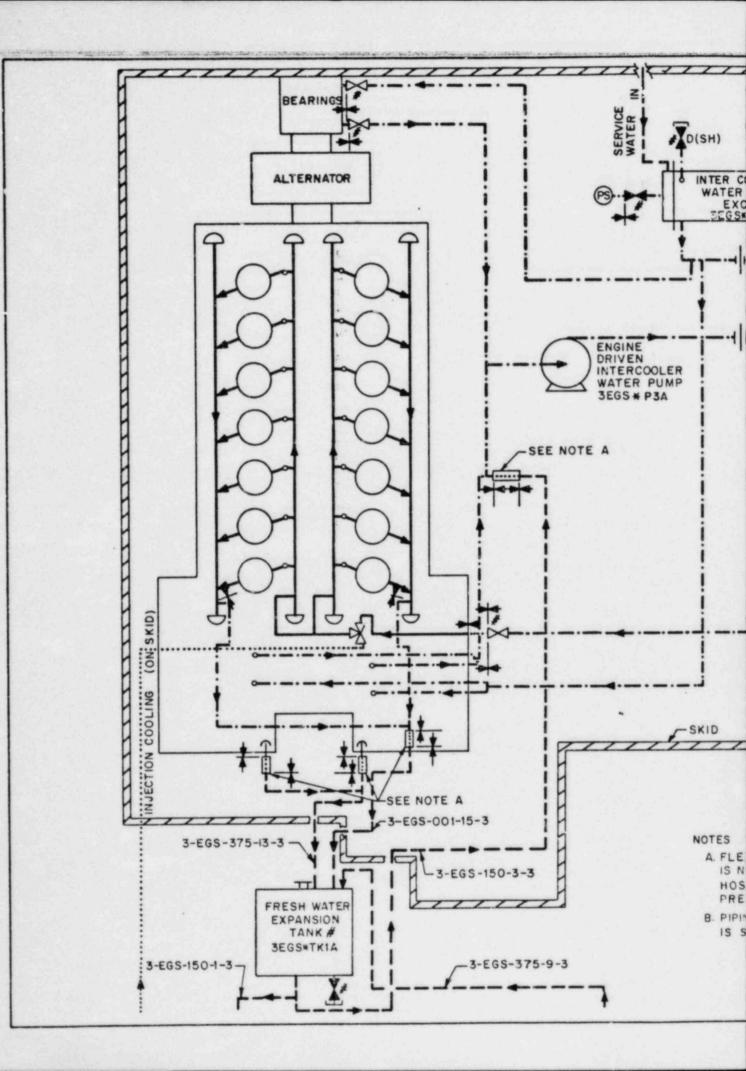


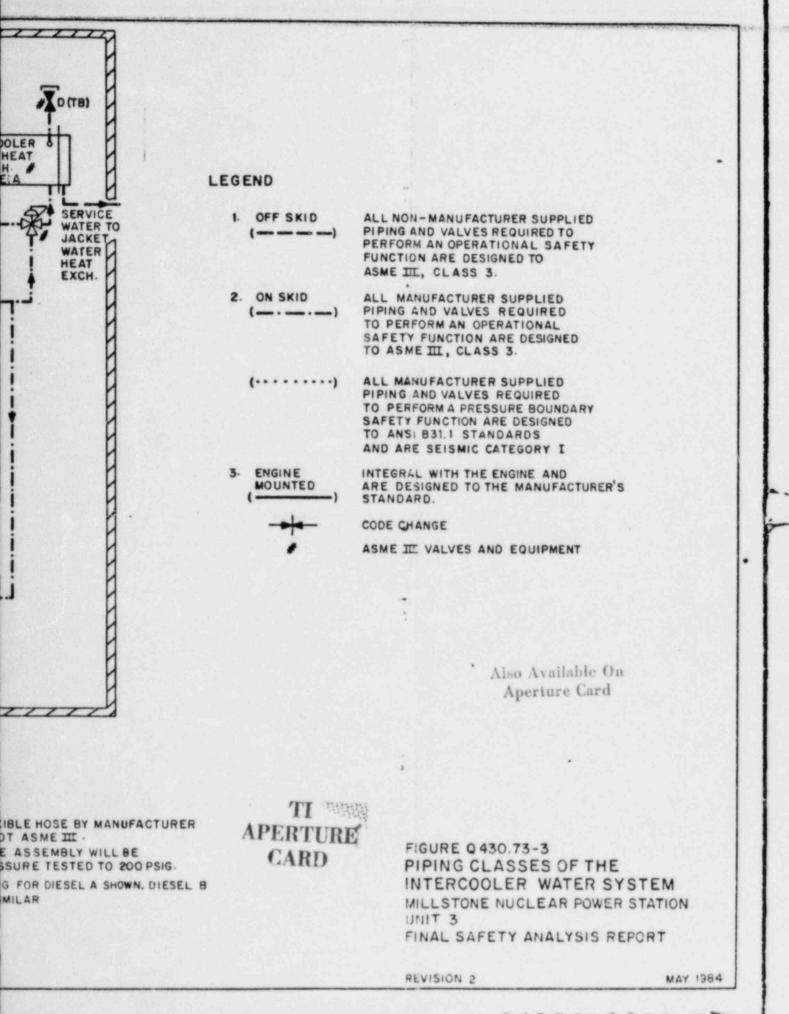
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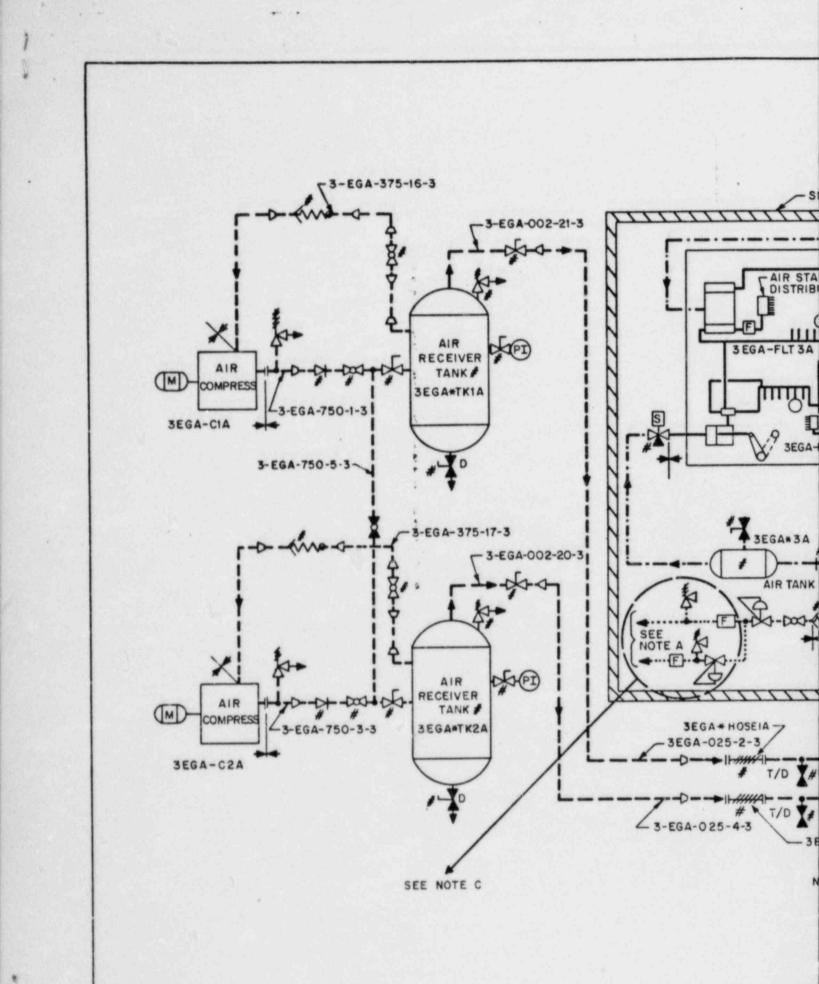


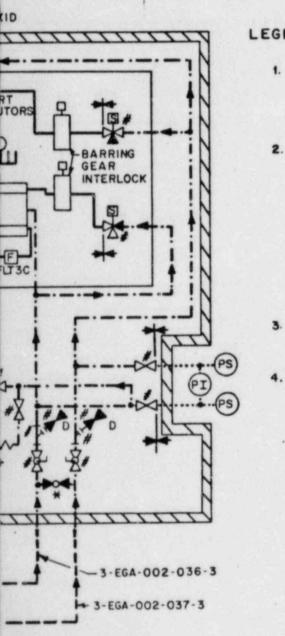






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LEGEND

1. OFF SKID

2. ON SKID (_____

(........)

ENGINE MOUNTED ALL NON - MANUFACTURER SUPPLIED PIPING AND VALVES REQUIRED TO PERFORM AN OPERATIONAL SAFETY FUNCTION ARE DESIGNED TO ASME III, CLASS 3.

ALL MANUFACTURER SUPPLIED PIPING AND VALVES REQUIRED TO PERFORM AN OPERATIONAL SAFETY FUNCTION ARE DESIGNED TC ASME III, CLASS 3.

ALL MANUFACTURER SUPPLIED FIPING AND VALVES REQUIRED TO PERFORM A PRESSURE BOUNDARY SAFETY FUNCTION ARE DESIGNED TO ANSI B31.1 STANDARDS AND ARE SEISMIC CATEGORY 1.

INTEGRAL WITH THE ENGINE AND ARE DESIGNED TO THE MANUFACTURER'S STANDARD.

CODE CHANGE

ASME III VALVES AND EQUIPMENT

Also Available On Aperture Card

ITI CONTRACT APERTURE CARD

GA * HOSE 2A

DTES

- A. PIPING RUNS TO TEMPERATURE CONTROL SYSTEM OF THE JACKET WATER SYSTEM AND IS OF SAME PIPE CLASSIFICATION.
- B. PIPING FOR DIESEL A SHOWN DIESEL B IS SIMILAR
- C. ALL. PORTIONS OF THE AIR START SYSTEM ARE HIGH ENERGY EXCEPT THE CIRCLED AREA.

FIGURE Q 430.73-4 PIPING CLASSES OF THE AIR START SYSTEM MILLSTONE NUCLEAR POWER STATION UNIT 3 FINAL SAFETY ANALYSIS REPORT

REVISION 2

MAY 1984

Single Failure Criterion

A single active component failure is assumed to occur in essential systems used to mitigate consequences of the postulated piping failure and to shut down the reactor. The single active component failure is assumed to occur in addition to the postulated piping failure and any direct consequences of the piping failure, such as unit trip and loss of offsite power. Section 3.1.1 defines this failure criterion and its applications.

Loss of Offsite Power

Offsite power is assumed unavailable if a trip of the turbine generator system or reactor protection system is a direct consequence of the postulated piping failure. However, a single failure of one emergency generator or one Class IE bus can be assumed as the single failure if this assumption is the most limiting.

Seismic Event

430.76

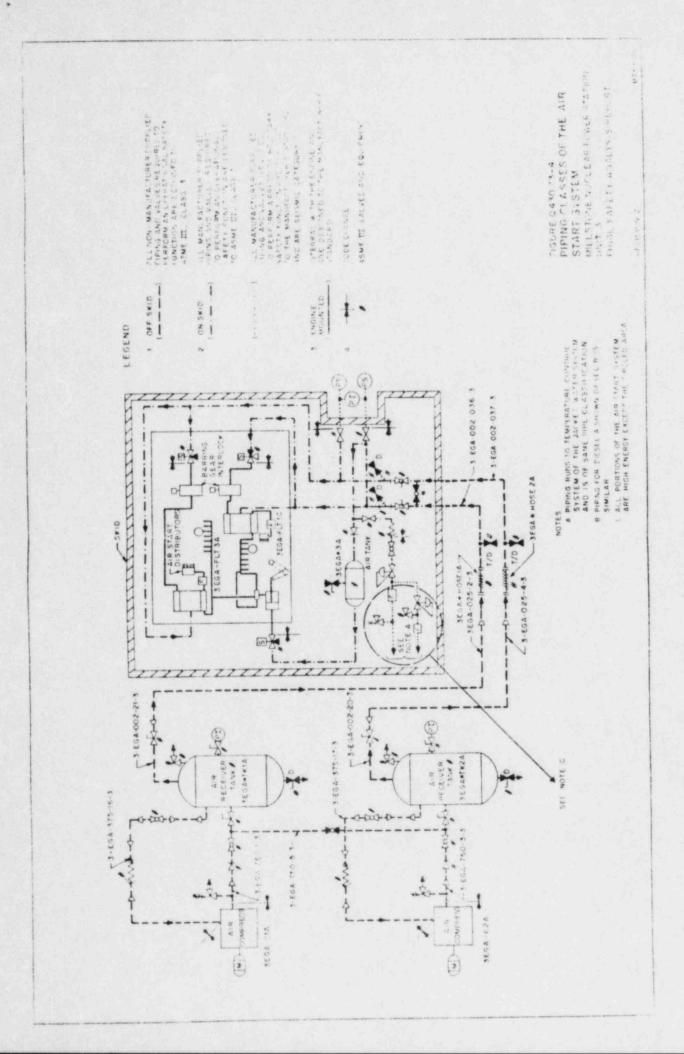
Credit for mitigating the consequences of a postulated event may be taken only for those systems and components designed to Seismic Category I requirements.

All available systems, including those actuated by operator actions, are used to mitigate the consequences of a postulated event. Judging the availability of systems includes consideration of the postulated failure and its direct consequences (e.g., unit trip and loss of offsite power) and the assumed single active component failure plus its direct consequences. The feasibility of the operator to take action is judged on the availability of ample time and adequate access to equipment for performing the proposed actions. Regulatory Guide 1.62 provides guidance in evaluating the feasibility of operator action.

3.6.1.3.2 Failure Mode and Effects

An analysis of breaks in high energy systems, cracks in moderate energy systems, and the consequent failure modes and effects (e.g., environmental, pipe whip, and jet impingement) must include consideration of their sources and targets. The source comprises the pipe which is postulated to fail and the resulting effects of the failure. The target comprises structures, systems, and components considered essential for shutting down the plant safely, maintaining the safe shutdown, and mitigating the effects of the postulated pipe failure.

Interactions between sources and targets are analyzed individually to determine how each affects essential equipment in the area of the source. The interactions analyzed are pipe whip, jet impingement, and environmental effects.



Millstone Nuclear Power Station, Unit No. 3 FSAR

Question 430.83 (Section 9.5.4)

In Section 9.5.4.1 of the FSAR you state that you comply with Regulatory Guide 1.137, "Fuel Oil Systems for Standby Diesel Generators" and ANSI N-195 "Fuel Oil Systems for Standby Diesel Generators." Section 9.5.4 emergency diesel engine fuel oil storage and transfer system (EDEFSS) does not provide adequate information to determine compliance. Provide sufficient information to show how you comply with this Regulatory Guide and ANSI Stradard N-195 in your design of the EDEFSS. Provide any justification for noncompliance.

Response:

Refer to revised FSAR Section 9.5.4 for the response to this question.

Revised Response

See response to question

435.84-

Millstone Nuclear Power Station, Unit No. 3

Question 430.84 (SRP Section 9.5.4)

You state in Section 9.5.4 of the FSAR that two fuel oil storage tanks are provided and the they are interconnected through piping, valves, and pumps so that either diesel may be supplied from the tanks. This is an acceptable design. However, you further state that the total fuel oil storage capacity of both tanks is sufficient to operate only one diesel generator for seven days. The other diesel generator must be shut down. This is unacceptable and does not meet the requirements of General Design Criterion 17, Regulatory Guide 1.137 Position C.1, ANSI N-195 Section 5.2, and Standard Review Plan 9.5.4 Sections I.1.d, and III.6.b which require seven days fuel oil storage for each diesel generator. We require that each emergency diesel generator be supplied with a fuel oil storage tank of sufficient capacity to operate the diesel generator for sevel days. The tank capacity shall be in accordance with R. G. 1.137. Comply with this position.

Respose:

Charlin nrs

The Applicant notes that the design meets the intent of Regulatory Guide 1.137 and ANSI N195 with the exception of respective document sections C-1 and 5.2. By not meeting ANSI N195 Section 5.2 he does not meet R. G. 1.137 C.1c. The Applicant notes he meets the remainder of the requirements of both R.G. 1.137 and ANSI N 195. The Applicant takes exception to SRP 9.5.4 - Section III.6.b and ANSI N 195 Section 5.2 for the following reasons: (1) The on-site storage facilities provide a 3 1/2 day fuel supply for each diesel generator assuming both units operate simultaneously at full load. Within 24 hours after notice for fuel has been given, the fuel oil storage tanks can be replenished from geographically diverse off-site fuel suppliers. Such notice will be given within 4 hours of an LOP coincident with a postulated accident per procedures. Fuel supplies can be extended to and beyond seven days, as required. In this manner 7 days' of fuel can be provided to an operating diesel generator. (2) Historically use grid supplying the Millstone site has proved very reliable. Since the plants at the site have been operational, offsite power has been restored 95%

of the time within 24 hours of first being lost. Consequently, the probability of requiring the \bigcirc for any time period exceeding 24 hours is small. Past experience indicates therefore that diesel generator operation in excess of 24 hours is highly unlikely.

A load shedding analysis has been performed which demonstrates that with reduction of loads, the emergency diesel generators will have the capability to be operated continuously for a minimum period of 5 1/2 days with margin that allows slightly over 6 days. In the analysis 8 hours into the worst case accident, which is a DBA coincident with a LOP, the loads may be reduced to appoximately 60% of rated capacity on Train A and to approximately 35% on Train B. The load on Train A remains constant where the load on Train B would increase to approximately 40% at 20 hours and fluctuate between 30% and 40% of rated load after 24 hours.

The above load shedding scheme may be implemented in the unlikely event that fuel oil would be unavailable after 24 hours into the accident. Fuel oil suppliers will be contacted within the first 4 hours of the accident.

9.5.3.3 Design Evaluation

Station lighting is provided to operate the unit safely under normal 18.3 and accident conditions, including a single failure and loss of 18.7 offsite power.

All fixtures within the control room are seismically supported. 18.8 Clips are provided to prevent the fluorescent lamps from breaking 18.9 electrical contact and/or dropping out of the electrical sockets 18.10 during a seismic event. Also, high quality ballasts are used to 18.11 minimize the interaction to the Class 1E system.

9.5.3.4 Inspection and Testing

Design of the station lighting systems permits routine surveillance 18.14 and testing of all critical lighting systems without disrupting 18.16 normal lighting service.

9.5.4 Emergency Generator Fuel Oil Storage and Transfer System 18.20

The emergency generator fuel oil storage and transfer system (EGF) is 18.21 a safety related system designed to supply fuel oil to the emergency 18.23 18.24 diesel generator engines.

9.5.4.1 Design Bases

The design bases for the EGF are as follows.

- The outside air summer design dry bulb temperature for the 18.31 1. Millstone Point site of 86°F and the outside air winter design dry bulb temperature of 0°F.
- In accordance with the codes and classifications listed in 18.34 2. Table 3.2-1.
- In accordance with General Design Criterion 2 and Regulatory 18.36 3. Guide 1.117, for the ability of structures housing the 18.37 system and the system itself to withstand the effects of natural phenomena such as earthquakes, tornadoes, 18.38 hurricanes, and floods, as established in Chapters 2 and 3.
- In accordance with General Design Criterion 4, for 18.39 4. structures housing the system and the system itself being 18.40 capable of withstanding the effects of external missiles and 18.41 internally generated missiles, pipe whip, and jet impingement forces associated with pipe breaks.
- 5. In accordance with General Design Criterion 5, for the 18.42 capability of the system and its components to perform its 18.43 required safety functions. A single active failure cannot 18.44 result in loss of the system-functional performance capabilities.

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- In accordance with Regulatory Guide 1.26, for the quality 18.46 group classification of system components.
- In accordance with Regulatory Guide 1.29, for the seismic 18.48 design classification of systems components.
- In accordance with Regulatory Guide 1.102, for the 18.50 protection of structures, systems, and components important to safety from the effects of flooding.
- In accordance with Regulatory Guide 1.137, for fuel oil 18.52 systems design, fuel oil quality, and tests.
- 10. In accordance with ANSI Standard N195, fuel oil systems for 18.54 420.93 standby diesel generators, except as noted herein.
- 11. In accordance with Branch Technical Positions APCSB 3-1 and 18.56 MEB 3-1, for breaks in high and moderate energy piping systems outside containment.
- 12. In accordance with Branch Technical Position ASB 9.5-1 18.57 Appendix A, guidelines for fire protection at nuclear power plants. 18.58
- 13. In accordance with General Design Criterion 17, for the 18.59 capability of the fuel oil system to meet independence and 18.60 redundancy criteria.

9.5.4.2 System Description

The EGF (Figure 9.5-2) is an ASME III, Class 3 system except for the 19.4 fill line, its associated strainer, and the flame arrestors which are 19.5 ANSI B.31.1, Class 4 (NNS). It provides fuel oil to the emergency 19.6 diesel generators for operation under all plant operating conditions 19.8 and during all design basis events. There is a separate fuel oil 19.9 storage and transfer flow path for each emergency generator. 19.10

Each flow path consists of a fuel oil storage tank, two 100 percent 19.11 capacity fuel oil transfer pumps and strainers, a day tank, and 19.12 piping to each respective diesel engine. The fuel oil transfer pumps 19.13 maintain the level in the day tanks automatically as discussed in Section 9.5.4.5. Each day tank has two sure and one return 19.14 connections to the fuel oil injection system. We must integrally, a. 19.15 provided with its respective diesel engine

The emergency generator fuel oil system has the following features. 19.16

1. Two tanks installed in an underground concrete vault - one 19.18 for each diesel engine. Each emergency generator fuel oil 19.20 storage tank is sized to store approximately 35,000 gallons 19.21 of diesel fuel oil. All openings are located in the top of 19.22 the tanks. Openings are provided for filling and draining, 19.23 sampling and sounding, level instrument connections, 19.24 determining fuel level with a stick gauge, pump piping

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connections, and a manway. Each tank is separately vented 19.26 to the atmosphere through a vent line fitted with a flame arrester.

Four full-capacity, electric motor-driven, vertical, 19.27 2. centrifugal, tank-mounted, emergency generator fuel oil 19.28 transfer pumps (Table 9.5-9) are supplied - two pumps for 19.29 430.22 each emergency generator fuel oil storage tank. Each pump 19.30 is provided with an orificed recirculation line back to its associated emergency generator fuel oil storage tank to 19.32 provide a minimum flow for pump protection. A dc 19.33 motor-driven fuel pump powered from a Class IE source is 430.83 provided in addition to the gear-driven engine-mounted pump 19.35 19.36 to ensure starting of the diesel generator.

Each pump has sufficient capacity to fill both day tanks 19.39 with both emergency generators running, since the fuel consumption at rated load and speed for one emergency 19.40 generator is 6.16 gpm.

- Two emergency generator fuel oil day tanks one for each 19.42 3. diesel engine. Each emergency gei rator fuel oil day tank 19.44 is sized to store approximately 550 U.S. gallons of diesel 19.45 fuel oil. Each day tank feeds its respective diesel fuel 19.46 oil injection system through two supply lines. Each tank is 19.47 located at an elevation to provide sufficient positive head for its respective diesel fuel oil injection system suction. 19.48 430.78 Each tank is located at an elevation conforming to a tank 19.49 bottom elevation of 3 feet above the diesel generator's "bottom of skid" elevation. This fulfills the diesel engine 19.51 manufacturer's recommendation of a minimum elevation of D feet above the diesel generator's "bottom of skid" 19.52 elevation. Two return lines from the diesel fuel oil 19.53 injection pumps, one to the day tank and one to the storage 19.54 tank, are provided for excess flow. Openings are provided 19.55 the day tanks for piping connections, level in instrumentation, and a manway. Valved drain connections are 19.57 provided in the bottom of the tanks for removing any accumulation of condensation. Each tank is separately 19.59 vented to the atmosphere through a vent line fitted with a flame arrester.
- Each of the redundant fuel oil transfer pumps is equipped 19.60 4. with its own fuel oil strainer. The strainers are 20.1 conventional simplex oil strainers with removable baskets for easy cleaning. Each strainer will ensure that the fuel 20.2 oil delivered to the day tank meets the diesel generator 20.3 manufacturer's standards of purity.
- An interconnection with two normally locked-closed valves 20.4 between the two emergency generator fuel oil supply headers 20.5 8-49 to facilitate the use of either tank to prove headers 20.5 5. to facilitate the use of either tank to supply either May 1984 Lis supplied emergency generator. One pump on each tank is arranged to 20.6 allow transfer from the A electrical bus to the B electrical

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bus, or vice versa, by means of a 480 V, seismically 20.8 qualified Class 1E, manually-opented transfer switch, under administrative control, thus ensuing a 7 day supply of 20.11 fuel for one diesel generator. (see Sections 8.3.1.1.2 and 20.12 9.5.4.5).

- A duplex fuel oil strainer is provided for each diesel 20.14 generator by the manufacturer.
- 7. All piping and fittings are ASME III, Class 3 carbon steel, 20.15 except for the fill line, its associated strainer, and the 20.16 flame arrestors which are ANSI B.31.1, Class 4. All piping 20.18 and fittings in the system are 150 pound rating. Piping 20.19 construction is welded throughout, except for the pumps 20.19 which have flanged connections.

The fuel oil storage tanks are located in an underground concrete 20.21 vault adjacent to the emergency generator enclosure. The tanks are 20.23 separated by a wall 18 inches thick to provide the minimum calculated 20.24 fire boundary between tanks. The vault's 2-foot thick concrete 20.25 outside walls and roof provide the required tornado protection per Regulatory Guide 1.117. Access openings and pipe penetrations have 20.27 water tight seals to provide protection of the vaults against the 20.28 effects of flocding. The fuel oil transfer pumps are mounted 20.29 directly on top of a flanged connection to the storage tanks. 20.30 Removable concrete covers are provided on the vaults to facilitate 20.31 pump maintenance or removal. The concrete vault covers are designed 20.32 to provide tornado and missile protection. The pump strainers and 20.33 discharge valves also are located in the vault area. The storage 20.34 tank vents are located outside the vaults and terminated at 6 feet 430.70 430.79 above finished ground grade in tornado and missile proof 2-foot thick 20.35 reinforced concrete labyrinth enclosures. The labyrinth enclosures 20.36 430.81 preclude the entrance of water into the fuel oil tanks through the vents. The common discharge line from each storage tank's transfer 20.37 pumps and the overflow line are routed underground to and from the 20.38 respective fuel oil day tank, which is located in the emergency generator enclosure. These lines run under the concrete structure to 20.39 provide the required tornado missile protection. The fuel oil 20.40 transfer pumps may be started and stopped manually from the emergency diesel generator panel located in the emergency generator enclosure. 20.41 The fuel oil storage tank fill lines are located outside the vaults, 20.42 430.70 430.79 terminated at an elevation of 3 feet-9 inches above finished ground 20.44 430.81 grade. The fill lines are capped and locked to preclude entrance of 20.45 water into the tanks. Should the fill lines become damaged, the fuel 20.46 oil storage tanks also can be filled from within their enclosure 20.48 through a manhole on the top of the tanks. In the event the fuel oil storage tank enclosure area is flooded, the tanks may be filled 20.49 through their vent lines which are located well above the site flood stage of 24 feet-6 inches (refer to Section 2.4.2.3). 430.70

The day tank vents are located and terminated 1 foot-6 inches above 20.50 the roof (elevation 51 feet-0 inches) of the emergency diesel 20.52 generator enclosure in their own tornado- and missile-proof 20.53 enclosure.

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Fiel oil degradation due to the turbulence of sediment in the bottom 20.54 of the fuel oil storage tank during the addition of new fuel oil is 20.55 minimized by the following.

- Normal fill line strainer (0.10 inch perforation size). 20.57
- 2. Fuel oil transfer pump discharge strainer (0.062 inch 20.58 perforation size). The strainer is provided with a pressure 20.59 differential indicating switch and alarm which activates a high differential pressure alarm on a local panel, and a 21.1 local panel trouble alarm on the main board. If a high 21.2 pressure differential exists that prevents sufficient fuel oil flow to the day tanks, the redundant fuel oil transfer 21.3 pump will be automatically started on low-low day tank level.
- 3. Engine-mounted duplex fuel oil filter (,00012 to .00020 21.4 inch). The filter is provided with a pressure differential 21.5 indicating switch which activates a high pressure alarm on a local panel, and a local panel trouble alarm on the main 21.7 board. These filters will be frequently monitored, and 21.8 filter cartridges replaced when necessary.

In addition, the fill line for each fuel oil storage tank is located 21.10 a sufficient distance from the fuel oil transfer pump to enhance 21.11 settling of sediment away from the pump suction.

To enable fuel oil pump testing, test piping is installed off the 21.12 pump discharge downstream of the system flow elements. This piping 21.14 allows fuel oil to be directed to the storage tank bypassing the diesel day tank. Normally closed valves located in the test lines 21.15 prevent bypass during transfer of fuel oil to the day tanks.

The emergency generator fuel cil storage tanks and the emergency 21.16 generator fuel oil day tanks are protected from corrosion by interior 21.17 and exterior corrosion protective painted coatings applied in accordance with Steel Structures Painting Council Standards PA1, 21.18 Paint Application Guide for Shop, Field, and Maintenance Painting; 21,19 Paint 6-68T, Coal Tar Epoxy Polyamide Black (or Dark Red) Paints and 21.20 Department of Defense Military Specification MIL-C-4556D, Coding Kit, Epoxy for Interior of Steel Fuel Tanks. To preclude the need for 21.21 cathodic corrosion protection, underground fuel oil piping is/encased in concrete, and the fuel oil storage tanks, fuel oil day tanks, and 21.22 all other piping in the fuel oil transfer system are focated in 21.23 underground concrete vaults. Coating

A number of design features are provided to prevent occurrence of a 21.24 fire. Both the storage tank and the day tank vents are routed 21.25 outside their respective areas and are equipped with flame arresters. 21.26

Temperature detectors in the storage tank, day tank, and emergency 21.27 generator enclosures alarm in the control room to notify the operator 21.28 of a potential fire. Operator action is required to interrupt the 21.29 power supply to the transfer pumps.

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Question 430.85 (Section 9.5.4)

In Section 9.5.4 provide a detailed description and operation of the fuel oil system. Specifically the filling of the day tanks from the fuel oil storage tanks, the operation of the high and low level control switches on the day tanks and the sequence of events for filling the day tanks, including selection of primary and secondary (standby) transfer pumps. You state that one of the transfer pumps on each storage tank can be powered from either Train A or Train B, and that selection of the power source is manual. From the information available and potential combination of transfer pump alignments it appears that an unnaceptable system operating arrangement could result. In order to adequately evaluate this system provide:

- A detail description and operation of the fuel oil system including controls, their function and operation, and other instrumentation provided.
- Discuss the sequence of events, operator action and procedures used in filling the fuel oil day tanks including selection of primary and secondary transfer pumps. In addition discuss the mode of operation of the transfer pumps.
- 3. A detail description of the electrical circuitry (including interlocks), special design features and potential combinations of pump cross connections achievable required operator actions, and procedures used to accomplish those potential combinations. These electrical features should be discussed in the appropriate section of Chapter 8.
- 4. Show for all accident and transient conditions, including those discussed in Section 9.5.4.3 of the FSAR that postulated combinations of pump selection and electrical circuits will not violate the independence criteria of GDC-17 as the result of operator action, operating procedures, and interlocks.

Response:

Refer to the responses to NRC Questions 430.32, 430.82, and 430.83, and FSAR Section 7.3.1.1.5 for the response to this question.

Revised Response:

Refer to the responses to 430.84 and 430.02.

Fire suppression for each of the fuel oil tank vaults is provided by 21.30 a total flooding carbon dioxide system that is actuated by heat 21.33 detectors. A discharge by either carbon dioxide system will be 21.34 annunciated in the main control room.

There is a complete and separate fuel oil storage and transfer flow 21.35 path for each eme:gency generator, each of which is located in a 21.36 separate fire area. A fire in either flow path will not affect the 21.37 operability of the other system from performing its designed task.

9.5.4.3 Safety Evaluation

As a result of the redundancy incorporated in the system design, the 21.40 ERG system will provide its minimum required safety function under 21.44 1 21.42 any one of the following conditions:

- loss of offsite power coir ident with failure of one 21.44 21.45 emergency generator;
- loss of offsite power coincident with maintenance outage or 21.47 21.48 failure of one emergency generator fuel oil transfer pump 21.49 associated with each emergency generator; and
- loss of offsite power coincident with maintenance outage or 21.50 21.51 failure of either emergency generator fuel oil storage tank.

Each of the emergency generator fuel oil storage tanks is sized to 21.53 store sufficient diesel fuel oil for a minimum of 3-1/2 days of 21.54 continuous operation of an emergency generator at rated load. An 21.56 interconnection with two normally locked-closed valves is provided between the two emergency generator fuel oil transfer pump discharge 21.57 headers to facilitate the use of either tank to supply either emergency generator. A single failure will not compromise the 21.58 independence of the two systems. There are no direct connections 21.59 between the two systems. One pump on each tank is arranged to allow 21.60 transfer from the A electrical bus to the B electrical bus, or visa versa, by means of a 480 V, seismically qualified Class 1E transfer 22.1 switch manually-operated under administrative control. Diesel oil 22.3 meeting ASTM (0975)1977 requirements is provided by regular and emergency fuel oil suppliers. Emergency fuel oil suppliers can 22.4 deliver fuel to the site within 24 hours after being contacted. 22.5 ensure that, within 4 hours Plant 3 after an LOP or postulated accident occurs, action will be taken to 22.6 22.7 notify suppliers of a need for fuel oil. Four regular fuel suppliers in three different locations include: Mobil Oil (New Haven, Connecticut and Providence, Rhode Island); Amerada-Hess (New Haven); 22.9 Guy's Oil Service (Niantic); and Lehigh Oil Company (Norwich). Four 22.10 emergency fuel suppliers located in three different places include: Mobil Oil; Lehigh Oil; Wyatt, Inc (New Haven); and Gulf Oil 22.11 (Norwich). All of these firms, both regular and emergency, can 22.12 provide oil using 8000-gallon fuel trucks. The New Haven based firms 22.13 (Mobil, Wyatt) can also supply fuel oil by railway tank car, if necessary.

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Rail routings exist which would not be subject to the detrimental 22.14 effects of floods. The railroads also can clear snow from tracks as 22.15 required. Land routes for trucks have proved dependable regarding 22.16 the ability to keep them clean even after heavy snowstorms. Since 22.17 fuel can be obtained overland through varied suppliers at different orientations (west, north, and east) from the site via Routes 1, 95, 22.18 or 52, adequate fuel availability despite the potential of flooding is ensured. The site access road will not become unusable during 22.19 floods, and is cleaned frequently during snowstorms. Consequently, 22.20 adequate provisions exist to obtain fuel from offsite sources even in unfavorable conditions, and to extend fuel supplies for an operating 22.22 single diesel generator to 7 days and beyond, as conditions require.

Additionally, should an LOP event occur, it has been estimated (see 22.23 EPRI Report NP-2301) that offsite power can be restored to the site 22.24 95 percent of the time within a 24 hour period. This estimate is 22.25 based on data reported for nuclear power plants within the region of the Northeast Power Coordinating Council. During the 14 years the 22.27 switchyard has been in operation, the Millstone site has experienced only one LOP. This event occurred when salt spray contaminated 22.28 insulators in the switchyard, causing them to flashover. These 22.29 insulators have since been replaced with ones having a considerably greater creepage distance which reduces the likelihood of flashover. 22.30 In addition, an automatic salt contamination monitoring system was 22.31 22.32 installed at the Millstone site in 1982. This system alarms at approximately 50 percent of the contamination level from salt-induced 22.33 flashovers, further reducing a repeat performance.

The transmission grid to which the Millstone switchyard is connected 22.34 is a highly integrated and reliable network which has not suffered an 22.35 outage since November 1965. The fact that power to the New York City 22.36 and Long Island areas was lost in 1977 without affecting Connecticut further attests to the reliability of the grid. 22.37

Grid reliability combined with a high probability of restoring 22.38 offsite power within 24 hours ensures that the present fuel oil 22.39 storage scheme for the emergency diesel generators is adequate.

In addition, the availability and reliability of offsite fuel oil 22.40 supplies to replenish fuel oil storage tanks has been demonstrated. 22.41 Consequently, the Applicant believes that grid reliability and fuel 22.42 availability justify the position that having a 7 day onsite fuel oil 22.44 storage capability per diesel generator is not necessary. The 22.45 Applicant, therefore, takes exception to this requirement in Regulatory Guide 1.137 and ANSI N195.

Each of the emergency generator fuel oil day tanks is sized to store 22.46 550 U. S. gallons of diesel fuel oil, in accordance with National 22.47 Fire Protection Association (NFPA) Standards (Section 3.1). This 22.48 storage capacity provides for approximately 1-1/2 hours of continuous operation of the emergency generator at rated load. When water is 22.50 removed or when draining of a day tank becomes necessary, a 1 inch drain line with a normally locked closed valve located at the bottom 22.51 of each tank is used. The oil is drained to a portable container and 22.52

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removed from the emergency diesel generator enclosure. The portable 22.53 43° ft tank becomes necessary.

The fuel oil day tanks and connecting piping to the fuel oil day 22.54 tanks are located a minimum distance of 28 methes 22.55

from the insulated diesel exhaust publing to preclude contact with these hot surfaces. Fuel oil piping 22.57 to the diesel generator fuel pumps is directed to the opposite end of the diesel, away from the insulated exhaust piping. 22.58

The fuel oil day tanks are located in an area monitored by a flame 22.59 detection system and protected with a sprinkler fire suppression 23.1 system to mitigate the consequences of an open flame in close proximity to the fuel oil day tanks.

day tank is designed for gravity feed to the emergency 23.2 The generators. The supporting structure is equipped with a drip pan to 23.4 contain leakage of oil from the day tank. Oil level in the drip pan 23.5 is monitored by a level switch (normal power only) which provides a signal to a high level alarm, located in the diesel enclosure, and a 23.6 common alarm in the control room, initiating operator action to drain the drip pan. Oil in the drip pan is addressed by system design; 23.8 i.e., the oil flows by gravity from the drip pan through a 4-inch drain line piped to the oil separator. Backflow prevention devices 23.10 preclude oil backing up out of the floor drains in the event of a day tank rupture. Further details on this drain path are provided in the 23.11 Millstone 3 Fire Protection Evaluation Report, as referenced in 23.12 Section 9.5.1.

Each fuel oil storage tank is provided with a sump for water 23.13 collection and removal. The fuel oil storage tanks are periodically 23.14 sampled for water contamination and accumulated water, if detected, is removed. Removal of water precludes the growth of algae which can 23.16 exist at the water-oil interface.

The sulphur content of the diesel fuel oil is 0.5 percent maximum (by 23.17 weight) to minimize corrosiveness of sulphur compounds in the diesel 23.18 engine exhaust gas. A winter blend of fuel oil is used to ensure a 23.19 cloud point in accordance with ASTM D975 and the ambient site conditions. Fuel oil supplied to the site is first checked for water 23.21 content and sediment upon its arrival. If acceptable, it will be off 23.22 loaded from its supply source to the fuel oil storage tanks. Fuel 23.23 will be sampled for quality requirements as called out in ANSI N195 and Regulatory Guide 1.137 in accordance with Safety Technical 23.24 Specifications.

Each emergency generator fuel oil transfer pump receives power from 23.25 its associated emergency generator (Section 8.3). 23.26

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9.5.4.4. Inspection and Testing Requirements

After the initial hydrostatic test on the emergency generator fuel 23.29 oil supply piping at completion of construction, all active system 23.30 components and controls are functionally tested periodically 23.32 (Section 16.3/4.8). The diesel fuel oil is sampled periodically to 23.33 determine possible contamination or deterioration of the oil in 23.34 storage.

Fuel oil is sampled quarterly to determine water and sediment 23.35 content. If a high level of sediment is detected, the reasons for 23.36 increased levels of sediment will be determined and appropriate 23.37 action taken. If algae is found to be the cause of the high vel of 23.38 tank sediment, a procedure will be written at that time to iddress 23.39 its treatment. Any accumulated water detected during sampling is 23.40

9.5.4.5 Instrument Requirements

The diesel generator fuel oil storage and transfer system operating 23.43 parameters are monitored, indicated, and controlled, locally or 23.44 remotely, as follows.

The following instruments and controls are . .ated on the emergency 23.47 generator panels:

	control switches and indicator lights for the emergency	23.50	
	generator fuel oil transfer pumps,	23.51	
	annunciators that alarm when the following conditions exist	23.53	
	for the emergency generator fuel system:	23 54	. 1
			141.83
	- storage tank fuel level low and high	23.57	14.
	- transfer pump discharge strainer differential pressure	60.00	
	high	23.59	
	- day tank fuel level low	24.1	
	- day tank fuel level low-low	24.2	14 30.88
	- day tank fuel level high	24.3	1.130.
	- day tank drip pan fuel level high (connected to normal		4-
	power system only)	24.6	1
	indicators that monitor the following parameters:	24.10	
	- emergency generator fuel oil storage tank fuel level	24.12	
	- emergency generator fuel oil day tank level	24.13	
	emergener generator rate our auf tann anter		
he fol	llowing emergency generator fuel oil system parameters are	24.18	
	ed by the plant computer:	24.19	
	- fuel oil transfer pump running	24.21	1.0.6
	- fuel oil transfer pump stopped	24.22	430.6
	- fuel oil transfer pump discharge pressure	24.24	
	- fuel oil transfer pump discharge flow	24.25	1.1
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24.26 H30.68 24.27 H30.68 - day tank fuel level - storage tank fuel level An emergency generator panel trouble annunciator is provided for 24.30 panels A and B in the control room. The annunciators are energized 24.31 when an alarm condition exists on the respective panel. Emergency generator fuel oil day tank level indicators are provided 24.32 on the main control board. There are local pressure indicators on the discharge of each transfer 24.33 pump and local level indicators for each fuel oil storage tank. 24.34 The fuel oil transfer pump can be manually or automatically operated. 24.35 "Auto" position, a low level condition will start the lead pump. At 24.39 level condition will cause both pumps to stop. Level switch 24.41 setpoints are determined in accordance with the guidelines of ANSI N195. A manually-operated transfer switch is provided for one of the two 24.42 transfer pumps on each storage tank. When electrical power is lost 24.43 to one of the storage tank pump systems, the transfer switch 24.44 disconnects that pump from its motor control center and reconnects it to the electrical supply of the other storage tank pump system. This 24.46 pump is then controlled manually by a circuit breaker. 24.49 9.5.5 Emergency Diesel Engine Cooling Water System Each of the two emergency diesel engines is cooled by the jacket 24.50 water and the intercooler water systems (Figure 9.5-3). 24.51 24.55 430.92 24.54 9.5.5.1 Design Bases 24.59 430.101 The redundant engine jacket water and intercooler water subsystems are joined at the common expansion tank and tempering valve V3A. The system as a whole is completely self-contained within a closed-loop. 25.1 These systems are cooled by the service water system (Section 9.2.1). Only the jacket and intercooler cooling water are used for cooling 25.2 the various engine components. The service water supply does not 25.3 interface with the cooling water systems, except at the cooling water 25.5 The engine-driven water circulating pumps (3EGS*P3 and 3EGS*P1) are 25.6 430.101 water leaving the engine for the temperature of the jacket cooline 25.6

of adequate capacity to limit the temperature of the jacket cooling 25.7 water leaving the engine to the engine manufacturer's specified limit 25.8 of 165°F, and to maintain the temperature of the intercooler water 25.9 leaving the air cooler water heat exchanger to 120°F under all 25.10 conditions based on the extremes of the service water temperature (Section 9.2.1).

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NRC Letter: May 31, 1983

Question Q430.88 (Section 9.5.4)

Section 9.5.4.3 states that "the supporting structure of the day tank is equipped with a drip pan of sufficient capacity to hold the entire contents of the day tank." Figure 9.5-2 of the FSAR shows a platform underneath the day tanks; it is assumed that this is the drip pan. This figure also shows a line coming off the platform labeled "to 55 gallon drum." Indicate whether the 55 gallon drum is located inside or outside of the diesel generator room, and show its location. Describe the operation of the day tank drainage system and the procedures that will be used when in operation to prevent an oil spill and resulting fire hazard in the diesel generator area.

Response:

Refer to revised FSAR Section 9.5.4.3 and revised Figure 9.5-2 for the response to this question.

The day tank drainage system was considered in the Fire Hazards Analysis provided in Section 5 of the Fire Protection Evaluation Report.

Refer also to the response to the Fire Protection Draft SER item No. 88 (FP-21) submitted by NNECO to the NRC March 23, 1984 (Letter No. B11070).

Rail routings exist which would not be subject to the detrimental 22.14 effects of floods. The railroads also can clear snow from tracks as 22.15 required. Land routes for trucks have proved dependable regarding 22.16 the ability to keep them clean even after heavy snowstorms. Since 22.18 430.24 22.17 fuel can be obtained overland through varied suppliers at different orientations (west, north, and east) from the site via Routes 1, 95, or 52. adequate fuel availability despite the potential of flooding is ensured. The site access road will not become unusable during 22.19 floods, and is cleaned frequently during snowstorms. Consequently, 22.20 adequate provisions exist to obtain fuel from offsite sources even in unfavorable conditions, and to extend fuel supplies for an operating 22.22 single diesel generator to 7 days and beyond, as conditions require.

Additionally, should an LOP event occur, it has been estimated (see 22.23 EPRI Report NP-2301) that offsite power can be restored to the site 22.24 95 percent of the time within a 24 hour period. This estimate is 22.25 based on data reported for nuclear power plants within the region cf the Northeast Power Coordinating Council. During the 14 years the 22.27 switchyard has been in operation, the Millstone site has experienced only one LOP. This event occurred when salt spray contaminated 22.28 insulators in the switchyard, causing them to flashover. These 22.29 insulators have since been replaced with ones having a considerably greater creepage distance which reduces the likelihood of flashover. 22.30 In addition, an automatic salt contamination monitoring system was 22.31 installed at the Millstone site in 1982. This system alarms at 22.32 approximately 50 percent of the contamination level from salt-induced flashovers, further reducing a repeat performance. 22.33

The transmission grid to which the Millstone switchyard is connected 22.34 is a highly integrated and reliable network which has not suffered an 22.35 outage since November 1965. The fact that power to the New York City 22.36 and Long Island areas was lost in 1977 without affecting Connecticut further attests to the reliability of the grid. 22.37

Grid reliability combined with a high probability of restoring 22.38 offsite power within 24 hours ensures that the present fuel oil 22.39 storage scheme for the emergency diesel generators is adequate.

In addition, the availability and reliability of offsite fuel oil 22.40 supplies to replenish fuel oil storage tanks has been demonstrated. 22.41 Consequently, the Applicant believes that grid reliability and fuel 22.42 availability justify the position that having a 7 day onsite fuel oil 22.44 storage capability per diesel generator is not necessary. The 22.45 Applicant, therefore, takes exception to this requirement in Regulatory Guide 1.137 and ANSI N195.

Each of the emergency generator fuel oil day tanks is sized to store 22.46 550 U. S. gallons of diesel fuel oil, in accordance with National 22.47 Fire Protection Association (NFPA) Standards (Section 3.1). This 22.48 storage capacity provides for approximatel 1-1/2 hours of continuous operation of the emergency generator at rated load. When water is 22.50 removed or when draining of a day tank becomes necessary, a 1 inch drain line with a normally locked closed valve located at the bottom 22.51 of each tank is used. The oil is drained to a portable container and 22.52

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removed from the emergency diesel generator enclosure The portable 22.53 430. ft container is brought into the enclosure only when draining of the tank becomes necessary.

The fuel oil day tanks and connecting piping to the fuel oil day 22.54 tanks are located a minimum distance of 28 inches 22.55

from the insulated diesel exhaust piping to preclude contact with these hot surfaces. Fuel oil piping 22.57 to the diesel generator fuel pumps is directed to the opposite end of the diesel, away from the insulated exhaust piping. 22.58

The fuel oil day tanks are located in an area monitored by a flame 22.59 detection system and protected with a sprinkler fire suppression 23.1 system to mitigate the consequences of an open flame in close proximity to the fuel oil day tanks.

The day tank is designed for gravity feed to the emergency 23.2 generators. The supporting structure is equipped with a drip pan to 23.4 contain leakage of oil from the day tank. Oil level in the drip pan 23.5 is monitored by a level switch (normal power only) which provides a signal to a high level alarm, located in the diesel enclosure, and a 23.6 common alarm in the control room, initiating operator action to drain the drip pan. Oil in the drip pan is addressed by system design; 23.8 i.e., the oil flows by gravity from the drip pan through a 4-inch drain line piped to the oil separator. Backflow prevention devices 23.10 preclude oil backing up out of the floor drains in the event of a day tank rupture. Further details on this drain path are provided in the 23.11 Millstone 3 Fire Protection Evaluation Report, as referenced in 23.12 Section 9.5.1.

Each fuel oil storage tank is provided with a sump for water 23.13 collection and removal. The fuel oil storage tanks are periodically 23.14 sampled for water contamination and accumulated water, if detected, is removed. Removal of water precludes the growth of algae which can 23.16

The sulphur content of the diesel fuel oil is 0.5 percent maximum (by 23.17 weight) to minimize corrosiveness of sulphur compounds in the diesel 23.18 engine exhaust gas. A winter blend of fuel oil is used to ensure a 23.19 cloud point in accordance with ASTM D975 and the ambient site conditions. Fuel oil supplied to the site is first checked for water 23.21 content and sediment upon its arrival. If acceptable, it will be off 23.22 loaded from its supply source to the fuel oil storage tanks. Fuel 23.23 will be sampled for quality requirements as called out in ANSI N195 and Regulatory Guide 1.137 in accordance with Safety Technical 23.24 Specifications.

Each emergency generator fuel oil transfer pump receives power from 23.25 its associated emergency generator (Section 8.3). 23.26

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9.5.4.4. Inspection and Testing Requirements

After the initial hydrostatic test on the emergency generator fuel 23.29 oil supply piping at completion of construction, all active system 23.30 components and controls are functionally tested periodically 23.32 (Section 16.3/4.8). The diesel fuel cil is sampled periodically to 23.33 determine possible contamination or deterioration of the oil in 23.34 storage.

Fuel oil is sampled quarterly to determine water and sediment 23.35 content. If a high level of sediment is detected, the reasons for 23.36 increased levels of sediment will be determined and appropriate 23.37 action taken. If algae is found to be the cause of the high level of 23.38 tank sediment, a procedure will be written at that time to address 23.39 its treatment. Any accumulated water detected during sampling is 23.40 removed when found.

9.5.4.5 Instrument Requirements

The diesel generator fuel oil storage and transfer system operating 23.43 parameters are monitored, indicated, and controlled, locally or 23.44 remotely, as follows.

The following instruments and controls are located on the emergency 23.47 generator panels:

	control switches and indicator lights for the emergency	23.50	1.634
	generator fuel oil transfer pumps,	23.51	
	annunciators that alarm when the following conditions exist	23.53	
2.27	for the emergency generator fuel system:	2 2 A	
			1410.93
	- storage tank fuel level low and high	23.57	141.
	- transfer pump discharge strainer differential pressure	23.58	
	high	23.59	
	- day tank fuel level low	24.1	
	- day tank fuel level low-low	24.2	14 30.88
	- day tank fuel level high	24.3	1 1 2 0 *
	- day tank drip pan fuel level high (connected to normal	24.5	14-
	power system only)	24.6	1.1.1.1
	indicators that monitor the following parameters:	24.10	
			6.00
	- emergency generator fuel oil storage tank fuel level	24.12	1.11
	- emergency generator fuel oil day tank level	24.13	
	The second second fuel oil evotem parameters are	24.18	10.5
	ollowing emergency generator fuel oil system parameters are	24.19	
onitoi	red by the plant computer:		1.11
	- fuel oil transfer pump running	24.21	430.6
	- fuel oil transfer pump stopped	24.22	130
	- fuel oil transfer pump discharge pressure	24.24	
	- fuel oil transfer pump discharge flow	24.25	1.1.1.1
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NRC Letter: 'May 31,1983 1.8

Question 430.107 (Section 9.5.6)

Diesel generators in many cases utilize air pressure or air flow 1.12 devices to control diesel generator operation and/or emergency trip functions such as air operated overspeed trips. The air for these 1.13 controls is normally supplied from the emergency diesel generator air starting system. Provide the following:

- a. Expand your FSAR to discuss any diesel engine control 1.16 functions supplied by the air starting system or any air system. The discussion should include the mode of operation 1.17 for the control functions (air pressure and/or flow), a failure modes and effects analysis, and the necessary P&ID's 1.18 to evaluate the system.
- Since air systems are not completely air tight, there is a 1.19 potential for slight leakage from the system. The air 1.20 b. starting system uses a non-seismic air compressor to maintain air pressure in the seismic Category I air In case of an 1.21 receivers during the standby condition. accident, a seismic event, and/or L.O.P., the sir in the air receivers is used to start the diesel engine. After the 1.22 engine is started, the air starting system becomes nonessential to diesel generator operation unless the air system supplies air to the engine controls. In this case 1.23 the controls must rely on the air stored in the air receivers, since the air compressor may not be available to maintain system pressure and/or flow. If your air starting 1.24 system is used to control engine operation, with the compressor not available, show that a sufficient quantity of air will remain in the air receivers, following a diesel engine start, to control engine operations for a minimum of 1.25 seven days assuming a reasonable leakage rate. If the air 1.26 starting system is not used for engine control describe the air control system provided and provide assurance that it 1.27 can perform for a period of seven days or longer.

Response:

1.30

Refer to revised FSAR Sections 9.5.6.3 and 9.5.6.5 for the response 1.31 to this question.

The Staff's concern on depleting the air in the air start system 1.33 while trying to start the engine is addressed in the response to NRC 1.34 Question 430.104 and FSAR Section 9.5.6.2. (Amendment 4)

Resetting of diesel engine while an automatic start signal is inserted will be addressed in operating proceedures and operator training.

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There is no sharing of starting air system components between the two 29.12 emergency generators. A complete failure in one emergency generator 29.13 starting air system will not lead to a failure of the other emergency 29.14 generator to start. A single active failure in either of the 29.15 emergency generator's redundant starting air systems will not lead to 29.18 the loss of the other redundant starting air system.

Protection from floods, tornadoes, and missiles is discussed in 29.20 Sections 3.4.1, 3.3, and 3.5, respectively. Protection from high and 29.21 moderate evergy pipe breaks is discussed in Section 3.6.1. 29.22

The emergency generator starting air system is Seismic Category I, as 29.24 defined in Regulatory Guide 1.29 (Section 3.2.1), Safety Class 3, and designed to Quality Group C Standards (Regulatory Guide 1.26, 29.25 Section 3.2.2), to the extent possible. Engine-mounted components 29.26 and the starting air compressors which are not covered in the rules 29.27 of ASME III, Code Class 3 are designed in accordance with the diesel 29.28 manufacturer's latest standards for reliability. These components 29.30 include the following:

	Ingine-mounted	air sta	art di	stributors	;			29×32	
	Ingine-mounted	air start valves;					29 X 33	×34 0	
	Ingine-mounted	starti							
•	Ingine-mounted servo; and	fuel	rack	shutdown	and	starting	booster	29×36	
								20/27	

Ingine-mounted piping and valves supplying air-to-jacket 29×37 water system air-operated valves (Section 9.5.5) which are 29.39 not required for performance of safety-related functions of the emergency generator.

The Seismic Category I starting air receiver tanks are of sufficient 29.41 9 capacity to start the emergency diesel generator and operate the 29.42 engine controls for at least 7 days. Starting air system leakage 29.43 will be determined at a minimum by periodic evaluation of the compressor cycling period. If the cycling period goes beyond 29.44 acceptable range, the system will be repaired.

430.107 Any failure that results in a loss of control air pressure to the 29.45 positioner of the diaphragm-operated three-way valve would cause the 29.46 valve to go into its safe position to fully open and will not cause 29.47 failure or shutdown of the diesel generator.

In addition, a 0.19 ft³ capacity, 450 psig design pressure, ASME III, 29.48 Class 3 air tank is provided in the air supply line to each servo 29.49 fuel rack shutdown and starting booster solenoid valve (3EGA*SOV25A&B). A check valve isolates the tank from the main 29.50 starting air system. The air tanks are provided to ensure a source 18 29.51 of air for positive fuel shut off in the event of loss of all starting air pressure in the main starting air system. However, a 29.53

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loss of this air will not result in the failure or shutdown of the emergency diesel generator.

9.5.6.4 Inspection and Testing Requirements

Test connections have been provided on the interconnecting piping 29.57 between the emergency generator and starting air tanks. This enables 29.60 the operator to manually bleed the storage tanks, and periodically, 30.1 to test and check startup of the starting air compressors.

Mcisture and other contaminants which might affect the air starting 30.2 system will be removed by periodic blowdown of the air storage tank. 30.3 Other plant operating procedures consistent with the recommendations 30.4 of the diesel manufacturer will be developed to ensure proper 30.5 functioning of the air starting system.

Section 8.3.1 discusses the emergency generator functional testing 30.6 |430.102 requirements.

9.5.6.5 Instrumentation Requirements

Each air compressor is equipped with a manual control switch and 30.9 indicator lights, located on the motor control center. A pressure 30.11 switch on the air receiver tank automatically starts and stops each compressor. This switch is set to start the compressor when the tank 30.12 pressure drops below the low setpoint pressure of 375 psig and to 30.13 stop the compressor when the pressure reaches the high setpoint pressure of 425 psig. Relief valves on the receiver tanks and at 30.14 each compressor discharge are set at 450 psig to protect the system from overpressurization. The compressor motor is also protected 30.16 against thermal overload.

If the receiver tank pressure drops to the low-low setpoint pressure 30.17 of 350 psig, the condition actuates an alarm an the respective 30.18 emergency generator panel and the emergency generator trouble alarm on the main control board. Each receiver tank is also provided with 30.19 a local pressure indicator. In the event receiver tank pressure 30.20 to supply a sufficient quantity of air for a minimum of 5 starts in $30.21 + 30^{-1/1}$ 10 seconds or less per start. This is based on interval of $30.22 + 430^{-1/1}$ drops to its low-low setpoint (350 psig) and the compressor is not test data provided in Table 9.5-11.

A control air system is connected to the starting air system 30.24 (Figure 9.5-3) to provide a source of air for operation of different 30.25 components in the jacket coolant temperature control system and the shutdown control system.

The jacket coolant temperature control system consists of a 30.26 temperature transmitter, a temperature controller, and a diaphragm 30.27 operated three-way valve with a positioner. Both the temperature 30.28 transmitter and the temperature controller are supplied with air at 30.29 20 psi from the starting air system.

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The temperature transmitter delivers an output signal between 3 and 30.30 15 psi as the temperature of the jacket coolant discharge from the 30.31 engine varies between 100°F and 200°F. A temperature of 100°F will 30.32 produce a temperature transmitter output signal of 3 psi while a temperature of 200°F produces a 15 psi output signal. 30.33

The temperature controller receives the 3 to 15 psi output signal 30.34 from the temperature transmitter and develops its own 3 to 15 psi 30.35 output signal that controls the positioner of the diaphragm operated three-way valve. The controller gives decreasing output pressure 30.36 with increasing input pressure (reverse acting) that will cause the valve to go into full cooling with a loss of air pressure (fail 30.37 safe).

The diaphragm operated three-way valve is controlled by a positioner 30.38 that receives the controller output pressure and air at 45 psi from 30.39 the starting air system. This causes the valve to open and close its 30.40 ports to control the flow of jacket coolant through the heat exchanger or divert the coolant around the heat exchanger so that the 30.41 temperature of the coolant discharged from the engine will remain at 30.42 the value set into the controller at all loads and ambient temperatures. The port controlling the flow of jacket coolant into 30.43 the shell side of the heat exchanger is fully open when the positioner receives a controller output pressure of 3 psi or less and 30.44 fully closed with a controller output pressure of 15 psi. Pressures 30.45 between 3 and 15 psi will result in both ports being partially open.

The shutdown control is also governed by the control air and starting 30.47 air systems.

The shutdown control consists of an air cylinder and an oil cylinder 30.48 in a two-compartment body. The air cylinder (linkage end) has 30.49 connection to the starting air control pressure. During starting, 30.50 the starting air pressure expands the cylinder by moving the piston which moves the linkage to the injection pump to admit fuel to the 30.51 engine.

Control air pressure is connected to the cylinder opposite to the rod 30.52 end through a line containing a shutdown solenoid valve. The engine 30.54 is stopped when the shutdown solenoid valve admits enough control air pressure against the piston to move the piston which will move the 30.55 injection pump linkage to the "no fuel" position.

9.5.7 Emergency Diesel Engine Lubrication System 30.57

Each emergency diesel engine lubrication system (Figure 9.5-3) 30.58 lubricates and cools various emergency diesel engine components. 30.60

9.5.7.1 Design Bases

The engine-driven lubricating oil and rocker-arm lubricating oil 31.4 pumps have sufficient capacity to ensure adequate lubrication of main 31.5 bearings, crank pins, camshaft bearings, valve gear, rocker arms, and 31.7

31.3

MNPS-3 FSAR

NRC Letter: May 31,1983

Question Q430.109 (Section 9.5.6)

The air starting system for your plant is defined as a high energy system. A high energy line pipe break in the air starting system of one diesel generator, plus any single active failure in any auxiliary system of the other diesel generator will result in loss of all onsite ac power. This is unacceptable. Provide the following information.

- a. Assuming a pipe break at any location in the high energy portion of the air start system, demonstrate that no damage from the resulting pipe whip, jet impingement, or missiles (air receivers, or engine mounted air tanks) will occur on either of the two diesel generators or their auxiliary systems.
- b. Section 9.5.6.3 states that the air receivers, valves, and piping to the engine are designed in accordance with ASME Section III Class 3 (Quality Group C) requirements to the extent possible. This is partially acceptable. We require the entire air starting system from the compressor discharge up to and including all engine mounted air start piping, valves and components be designed to Seismic Category I, ASME Section III Class 3 (Quality Group C) requirements. Show that you comply with this position.

Response:

See Response to Question 430.76

Single Failure Criterion

A single active component failure is assumed to occur in essential systems used to mitigate consequences of the postulated piping failure and to shut down the reactor. The single active component failure is assumed to occur in addition to the postulated piping failure and any direct consequences of the piping failure, such as unit trip and loss of offsite power. Section 3.1.1 defines this failure criterion and its applications.

Loss of Offsite Power

Offsite power is assumed unavailable if a trip of the turbine generator system or reactor protection system is a direct consequence of the postulated piping failure. However, a single failure of one emergency generator or one Class IE bus can be assumed as the single failure if this assumption is the most limiting.

Seismic Event

430.76

Credit for mitigating the consequences of a postulated event may be taken only for those systems and components designed to Seismic Category I requirements.

All available systems, including those actuated by operator actions, are used to mitigate the consequences of a postulated event. Judging the availability of systems includes consideration of the postulated failure and its direct consequences (e.g., unit trip and loss of offsite power) and the assumed single active component failure plus its direct consequences. The feasibility of the operator to take action is judged on the availability of ample time and adequate access to equipment for performing the proposed actions. Regulatory Guide 1.62 provides guidance in evaluating the feasibility of operator action.

3.6.1.3.2 Failure Mode and Effects

An analysis of breaks in high energy systems, cracks in moderate energy systems, and the consequent failure modes and effects (e.g., environmental, pipe whip, and jet impingement) must include consideration of their sources and targets. The source comprises the pipe which is postulated to fail and the resulting effects of the failure. The target comprises structures, systems, and components considered essential for shutting down the plant safely, maintaining the safe shutdown, and mitigating the effects of the postulated pipe failure.

Interactions between sources and targets are analyzed individually to determine how each affects essential equipment in the area of the source. The interactions analyzed are pipe whip, jet impingement, and environmental effects.

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Question Q430.114 (Section 9.5.7)

Describe the instrumentation, controls, sensors and alarms provided 1.12 for monitoring the diesel engine lubrication oil system and describe 1.13 their function. Describe the testing necessary to maintain a highly 1.14 reliable instrumentation, control, sensors, and alarm system and where the alarms are annunciated. Identify the temperature, 1.16 pressure, and level sensors which alert the operator when these parameters exceed the ranges recommended by the engine manufacturer 1.17 and describe any operator action required during alarm conditions to prevent harmful effects to the diesel engine. Discuss systems 1.19 interlocks provided. Revise your FSAR accordingly. 1.20

Response:

1.21

1.11

 Refer to revised FSAR Section 9.5.7.5 for a description of the 1.23 instrumentation, controls, sensors, and their functions. 1.24

Testing will comply with requirements stated in IEEE 1.26 Standards 279-1971 and 338-1971 (refer to FSAR Sections 7.1.2.11 1.27 and 7.3.1.1.5), and a minimum calibration frequency of once every 18 months or more frequently as specified in Millstone Station 1.28 Procedures

- Refer to FSAR Chapter 16 and Section 8.3.1.1.3 Items 2 and 3 for 1.31 testing.
- 3. Refer to revised FSAR Section 9.5.7.5 for location of alarms. 1.32
- Refer to revised FSAR Section 9.5.7.5 for identification of 1.33 instrumentation.
- 5. Millstone 3 operating procedures address actions to be taken in 1.34 response to alarm conditions. These actions are consistent with 1.35 the engine manufacturer's guidelines and prevent harmful effects to the diesel engine. Copies of these operating procedures will 1.37 be available for NRC review 60 days prior to system turnover.
- Refer to revised FSAR Section 9.5.7.5 and FSAR Section 8.3.1.1.3 1.38 for interlocks that trip engine on low lube oil pressure or on 1.39 high lube oil temperature.

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and valves. The subsystem will be normally isolated by locked closed 35.30 ASME III isolation valves. The loop will only be used during the 35.31 monthly diesel engine testing.

On detection of moisture, the detector will annunciate a "local panel 35.32 trouble" alarm on the main control board and actuate an alarm on the 35.33 local board located in the emergency generator enclosure.

Addition of lubricating oil will be done by trained maintenance 35.34 personnel using procedures developed and proven satisfactory during 35.35 the preoperational and startup test program to prevent entry of deleterious materials into the engine lubrication oil system. 35.36

The diesel engine prelubrication system is self-contained and 35.37 integral to the diesel engine. Continuous operation is permitted in 35.38 accordance with the manufacturer's recommendations. The "V" design 35.39 of the diesel engine allows for lubricating oil to continuously drain down to the engine sump. This prevents the buildup of lubricating 35.40 oil in the cylinders which could be blown into the exhaust system on engine start. The turbocharger lubricating system is self-contained 35.42 and does not get its supply from the engine oil header thus preventing buildup of oil in the turbocharger housing during 35.43 prelubrication of the engine.

Each diesel engine prelubrication system is periodically inspected 35.44 during plant operation for possible leakage. This ensures against 35.45 any dangerous accumulations of lubricating oil that could ignite during continuous prelubrication.

The prelubrication period for the rocker arm lubricating system is 35.46 2 minutes prior to any manual start which is in accordance with the 35.47 recommendations of the diesel engine manufacturer.

9.5.7.4 Inspection and Testing Requirements

Section 8.3 discusses emergency generator inspection and testing 35.51 requirements.

9.5.7.5 Instrumentation Requirements

Section 8.3 discusses emergency generator protective trips and trip 35.56 circuit bypasses. Refer to Chapter 16, Technical Specifications, for 35.58

A low lubricating oil level alarm is provided to alert personnel when 35.59 the lubricating oil level in the sump falls below the manufacturer's 35.60 recommended minimum level.

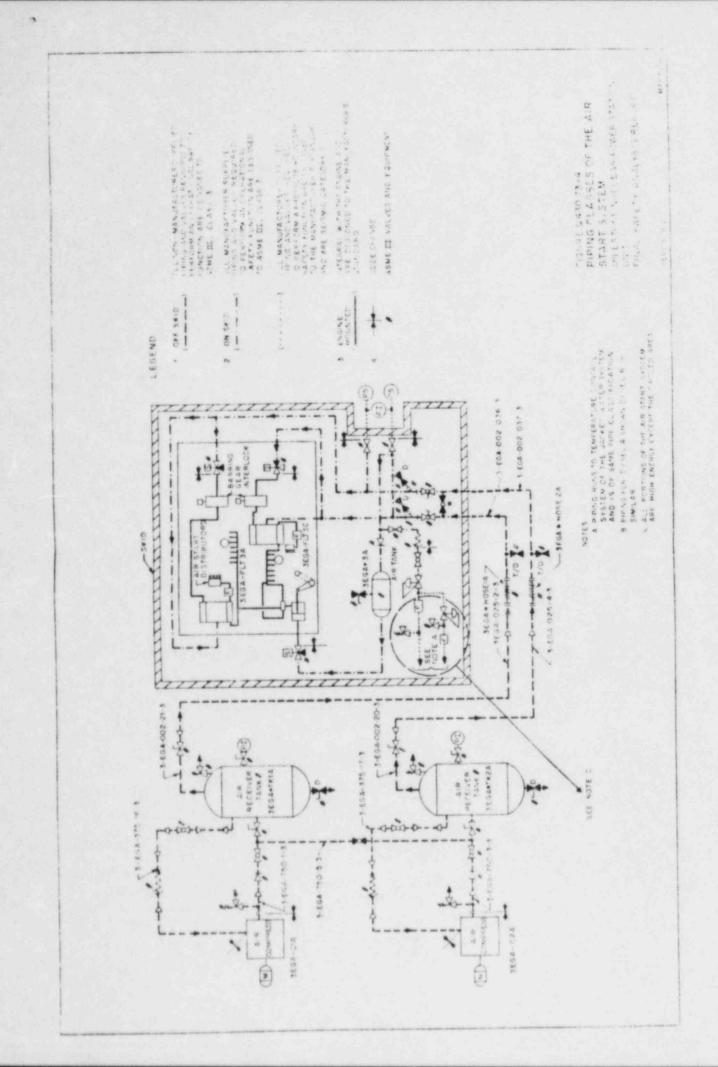
A high-pressure alarm is provided to alert personnel when the 36.1 pressure in the crankcase exceeds the manufacturer's recommended 36.2 high-pressure limit.

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A high level alarm switch is provided to alert personnel when the oil level in the separate rocker arm lubricating oil tank exceeds the manufacturer's recommended maximum.

A low-pressure alarm on the local panel and a local panel trouble alarm on the main control board are provided to alert personnel when the rocker arm lubricating oil pressure falls below the manufacturer's recommended minimum. Upon actuation of this alarm, the rocker arm lube oil reservoir level and the rocker arm lube oil duplex filter pressure differential will be checked and corrective action taken to maintain operability of the rocker are lube oil system. In addition, the rocker arm lube oil reservoir level will be checked daily on operating engines, and prior to any manual start.

Actuation of the low lube oil pressure switch will energize an annunciator and give an alarm that the lubricating oil pressure has reached a dangerously low level. Actuation of any 2 of these low lube oil pressure switches will shutdown the engine.

High- and low-temperature alarms are provided to alert personnel when the oil temperature rises above, or falls below, the operating range recommended by the manufacturer.

The following annunciators are on each emergency generator local panel:

- moisture detector circulating pump motor thermal overload or loss of control power.
- o lube oil moisture content high
- o rocker arm lube oil pressure low
- o crank case pressure high
- o lube oil sump temperature low
- o lube oil sump level low
- o lube oil temperature high
- o rocker arm reservoir level high
- o lube oil pressure low

An emergency generator local panel trouble annunciator for each panel is located on the main control board and is alarmed whenever a respective local panel annunciator is alarmed.

9.5.8 Emergency Generator Combustion Air Intake and Exhaust System

The emergency generator combustion air intake and exhaust system supplies filtered air to the emergency diesel engine for combustion and releases exhaust gases to atmosphere (Figure 9.5-3).

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NRC Letter: May 31, 1983

Question Q430.131 (Section 9.5.8)

Experience at some operating plants has shown that diesel engines have failed to start due to accumulation of dust and other deleterious material on electrical equipment associated with starting of the diesel generators (e.g., auxiliary relay contacts, control of the diesel generators (e.g., auxiliary relay contacts, control switches etc.). Describe the provisions that have been made in your diesel generator building design, electrical starting system, and combustion air, and ventilation air intake design(s) to preclude this condition to assure availability of the diesel generator on demand.

Also describe under normal plant operation what procedure(s) will be used to minimize accumulation of dust in the diesel generator room; specifically address concrete dust control.

Response:

All panels, except the control panel, that house electrical, controls, and instrumentation equipment associated with starting the diesel generators are attached to the diesel generator skid and are NEMA 3 or 12 type, dustright. The free standing control panel is a NEMA 3 ventilated enclosure. However, louvers are provided with this panel.

All air filters will be inspected and cleaned as necessary on a weekly basis in accordance with the normal station housekeeping procedure. The interior of the control panel will be cleaned using low pressure air on a weekly basis, as required. The diesel generator enclosure floor slab will be treated with an appropriate sealant to preclude concrete dust. a entrate.

In addition, the immediate area near the diesel generator enclosure where combustion and ventilation air intakes are located will be concrete paved to minimize dust entrainment. Open Items

Auxiliary Systems Branch

ASB-15 Dust Accumulation in Diesel Generator Building (Draft SER Section 9.4.6)

The applicant has not provided sufficient information regarding protection from dust accumulation; the staff, therefore, cannot conclude that it meets the requirements of GDC 17 regarding protection from unacceptable dust collection in accordance with the guidelines of NUREG/CR-0660. This is an open item.

Response (4/84)

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Refer to a response to NRC Question No 430.131.

Millstone Nuclear Power Station Unit No. 3 FSAR

Question 430.133 (Section 9.5.8)

Diesel generators for nuclear power plants should be capable of operating at maximum rated output under various service conditions. For no load and light operations, the diesel generator may not be capable of operating for extended periods of time under extreme service conditions or weather disturbances without serious degradation of the engine performance. This could result in the inability of the diesel engine to accept full load or fail to perform on demand. Provide the following:

a. The environmental service conditions for which your diesel generator is designated to deliver rated load including the following:

Service conditions

- 1. Ambient air intake temperature range ^oF
- 2. Humidity, max %
- b. Assurance that the diesel generator can provide full rated load under the following weather disturbances:
 - A tornado pressure transient causing an atmospheric pressure reduction of 3 psi in 1.5 seconds followed by a rise to normal pressure in 1.5 seconds.
 - 2. A low pressure storm such as a hurricane resulting in ambient pressure of not less than 26 inches Hg for a minimum duration of two (2) hours followed by a pressure of no less than 26 to 27 inches Hg for an extended period of time (approximately 12 hours)
- c. In light of recent weather conditions (subzero temperatures), discuss the effects low ambient temperature will have on engine standby and operation and effect on its output particularly at no load and light load operation. Will air preheating be required to maintain engine performance versus ambient temperature for your diesel generator at normal rated load, light load, and no load conditions. Also provide assurance that the engine jacket water and lube oil preheat systems have the capacity to maintain the diesel engine at manufacturer's recommended standby temperatures with minimum expected ambient conditions. If the engine jacket water and lube oil preheat systems capacity is not sufficient to do the above, discuss how this equipment will be maintained to do the above, discuss how this equipment will be maintained at ready standby status with minimum ambient temperature.
- d. Provide the manufacturer's design data for ambient pressure vs. engine derating.

 Discuss the effects of any other service and weather conditions will have on engine operation and output, i.e., dust storm, air restriction, etc.

Response:

a.

- a.1. Ambient air intake range is -17°F to 102°F.
- a.2. Maximum relative humidity is 100 percent.

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b. According to the manufacturer, engines are rated on a basis of longterm effects on the life of the engine due to altitude and ambient temperatures. The manufacturer has provided assurance that hurricanes and tornados are considered short-term conditions and are of no consequence to the rate or capability of these units. In addition, from data provided by the manufacturer, there would be no long term derating of the units for ambient pressures of 26 inches Hg or above.

Pristing .

The diesel engines level of degradation vs. percentage of full load applied to a full speed no load condition with low ambient intake air temperatures has been confirmed. The diesel engine manufacturer states that there is no degradation of the diesel engines ability to accept and carry load after operation at full speed no load condition at low ambient intake air temperatures.

In addition, the manufacturer has assured that air preheating is not required.

The engine jacket water system is heated by an 18 kW electrical heater. The water is circulated by the standby jacket coolant motordriven pump. The jacket water temperature is controlled between 105° F, and an alarm sounds if the jacket water temperature reaches 95° F.

The lube oil system is heated by a 15 kW heater with circulation provided by the motor-driven prelube and filter pump. The lube oil is controlled between 120°F and 125F at the heater, and an alarm is given if the lube oil temperature in the oil sump reaches 110°F.

These keep-warn systems have sufficient capacity to maintain the diesel engine at the manufacturer's recommended standby temperatures at minimum expected ambient conditions. Refer to the response to NRC Question 430.122 for measures that may be taken in the event of a failure of the emergency diesel generator enclosure heating system to maintain the minimum expected ambient conditions above 50°F.

d. Manufacturer derating data is applicable on a long-term basis for the altitude derating and is not applicable to short-term phenomena such as tornados, hurricanes, tropical storms, or other weather depressions. There are no adverse effects from other service or weather conditions on engine operation.

e.

Refer to FSAR Sections 9.5.4.2 and 9.5.8.3, and the responses to NRC questions 430.19, 430.70, 430.81, 430.91, 430.120, 430.126, 430.129, and 430.134 for additional discussions of service and weather conditions on diesel operation.

Millstone Nuclear Power Station, Unit No. 3 FSAR

NRC Letter: May 31, 1983

Question Q430.134 (SRP Section 9.5.8)

You state in Section 9.5.8.3 that damage to the exposed portions of the diesel exhaust pipe by tornado missiles has been considered. An access hatch in the exhaust ductwork, which will be manually opened during tornado alerts, functions as an exhaust bypass (secondary exhaust path) in the vent of tornado missile damage to the exhaust system. This is an acceptable design. However, Figure 9.5.4 of the FSAR shows the location of the exhaust access hatch in relation to the exhaust ductwork and the exhaust plenum openings.

- a. From the drawings, a tornado missile, entering either the 66" x 100" or the 48" x 168" plenum openings, could cause sufficient damage to exhaust ductwork and the access hatch to degrade diesel generator operation or result in the unavailability of the diesel generators. We require that the exposed portions of the exhaust stacks be tornado missile protected. Comply with this position.
- b. In the event of freezing rain, ice storm, and/or a snow storm because of the location of the openings, clogging or total blockage, or the freezing shut of the access hatch could results. Describe the design features, inservice inspection procedures, and technical specifications which will preclude this event, or alter your design to address the concern.

Response:

a. Damage to the access hatch from tornado missiles is not credible. No viable missile trajectory targets the access hatch. Once the access hatch is open, exposed portions of the exhaust ductwork are not required. Damage to these exposed parts will not degrade the exhaust.

The plenum openings are sufficiently small and restricted to preclude the entrance of missiles large enough to cause the damage described. The exhaust duct is a 40 inch diameter pipe with a 3/8 inch wall thickness. It is seismicly supported to withstand the high forces and accelerations experienced during a seismic event. This design gives the exhaust duct and access hatch adequate protection against expected tornado generated missiles. The required missile trajectories necessary to cause damage to the exhaust stack coincident with the elevations required for missile damage are not credible. The proximity of adjacent buildings shields the engine's stack and further decreases the existance of a credible missile path. As described in the response to NRC Question 430.129, the diesel engine exhaust is equipped with a normally open, low point drain which promotes drainage of water. Frozen precipitation is melted during the monthly diesel generator availability tests and drained through the same exhaust low point drain. It is not credible that any precipitation which could collect and freeze before passing through the drain line, would be sufficient to cause exhaust restriction due to the large exhaust pipe diameter.

Plant personnel will be instructed on procedures for opening the access hatch in the event that there is an ice or snow buildup in the exhaust pipe plenum or on the access hatch.

b.