

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
WOLYONE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Seld'n Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

February 10, 1992

Docket No. 50-423

B14022

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3  
Proposed Revision to Technical Specifications  
Response Times for the Reactor Trip System and  
Engineered Safety Features Actuation System Instrumentation

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, NPF-49, by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 3.

Description of the Proposed Changes

As a part of the Technical Specification improvement effort, NNECO proposes to remove two tables from the Millstone Unit No. 3 Technical Specifications which list reactor trip system (RTS) instrumentation response times and engineered safety features actuation system (ESFAS) instrumentation response times. These tables (Tables 3.3-2 and 3.3-5) will be placed in the Millstone Unit No. 3 Operating Procedure OP-3273, Technical Requirements--Supplementary Technical Specifications. The requirement to periodically measure these response times will remain in the Technical Specifications. The Index of the Technical Specifications has been revised to reflect deletion of the tables. Also, the appropriate Bases section has been revised to reflect the proposed changes. It is noted that the Technical Specification changes for the RTS and ESFAS instrumentation response times similar to those proposed here have been accepted by the NRC on Byron Units 1 and 2 (Docket Nos. 50-454 and 50-455).

Safety Assessment

As stated above, the Millstone Unit No. 3 Technical Specifications will still contain a surveillance requirement to verify that the RTS and ESFAS instrumentation response times are within the limits at least once per 18 months. If a response time limit is not met, the affected channel is declared inoperable. In addition, Technical Specifications will still contain the ACTION requirement to be implemented when a channel is declared inoperable. Therefore, sufficient control will remain in the Technical

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Specifications to ensure response times are periodically checked and instrument operability is maintained.

As indicated above, the response time tables will be placed in the Millstone Unit No. 3 Operating Procedure OP-3273, Technical Requirements--Supplementary Technical Specifications. A change to a response time value listed in Operating Procedure OP-3273 would require a 10CFR50.59 evaluation to be performed. The 10CFR50.59 evaluation involves a review of the three criteria in 10CFR50.59(a)(2) to determine if the proposed change involves an unreviewed safety question. Also a Plant Operation Review Committee (PORC) review and approval of a proposed change will be required.

The process outlined above will ensure a thorough review is performed on proposed changes to items relocated from the Technical Specifications to the Operating Procedure.

#### Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed changes and has concluded that they do not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve a significant hazards consideration because the changes would not:

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

The proposed changes to remove the RTS and ESFAS response times from the Technical Specifications will not affect the operation of the RTS and ESFAS. Operability and surveillance requirements are still maintained in the Technical Specifications and the response times will be included and maintained in the plant operating procedure. A safety evaluation and PORC review will be required for the limits to be changed. Since the systems will not be affected by the proposed changes, there is no impact on the performance of these systems or the consequences of an accident previously analyzed.

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

There are no new failure modes associated with the proposed changes. Since the plant will continue to operate as designed, the proposed changes will not modify the plant response to the point where it can be considered a new accident.

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

The proposed changes do not have any adverse impact on the protective boundaries nor do they affect the consequences of any accident previously

U.S. Nuclear Regulatory Commission  
E14022/Page 3  
February 10, 1992

analyzed. The Technical Specification operability and surveillance requirements will still ensure that the systems are tested and within the limits. Changing the limits requires a safety evaluation and PORC review which will ensure that the licensing basis is maintained. Therefore, the proposed changes will not impact the margin of safety as defined in the basis of any Technical Specification.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are considered not likely to involve a significant hazards consideration. Although the proposed changes are not enveloped by a specific example, the proposed changes would not involve a significant increase in the probability or consequences of an accident previously analyzed. As previously stated, the removal of the RTS and ESFAS instrumentation response times from the Technical Specifications has no adverse impact upon plant operation or safety. Since operability and surveillance requirements are still contained in the Technical Specifications, the changes do not reduce the effectiveness of Technical Specification requirements. In addition, the response times will be maintained in a plant procedure. Any changes to the response times will be made in accordance with the provisions of 10CFR50.59.

The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved this proposed amendment and concurs with the above determination.

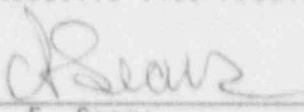
In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

Regarding our proposed schedule for this amendment, we request issuance at your earliest convenience with amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka  
Executive Vice President

BY:   
C. F. Sears  
Vice President

cc: See page 4

