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June 27, 1984

Docket No. 50-423 B11249

Director of Nuclear Reactor Regulation 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 letter to W. G. Counsil, Request for Additional Information for Millstone Nuclear Power Station, Unit No. 3, dated October 3, 1983.
 - (2) W. G. Counsil letter to B. J. Youngblood, response to Question 420.6, dated January 13, 1984.

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit No. 3 Revised Response to Question 420.6

In Reference (2), Northeast Nuclear Energy Company (NNECO) submitted a response to the Question 420.6 contained in Reference (1) describing how the provisions of Regulatory Guide 1.97, Revision 2, have been or will be met. The purpose of this letter is to identify and justify an additional deviation from the Regulatory Guide 1.97, Revision 2. Attachment I describes that deviation and justification from the Regulatory Guide which was discussed with and approved by your Mr. J. Joyce, Instrumentation and Control Systems Branch during a telecon with NNECO representatives on May 15, 1984.

The information contained in the Attachment I, will be added to the original response to Question 420.6 and will be incorporated into the FSAR in a future amendment.

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If there are 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 information 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.

My Commission Expires March 31, 1988

ATTACHMENT I

Justification for a deviation from Regulatory Guide 1.97, Rev. 2

Deviation:

Regulatory Guide 1.97, Revision 2, note 18 states "An installed capability should be provided for obtaining containment sump, ECCS pump room sumps, and other auxiliary building sump liquid samples."

Justification:

Direct containment sump sample capability exists using the pumps in the Recirculation Spray System. Determination of the magnitude of the release of radioactive materials due to leaks in the Engineered Safety Features (ESF) building and Auxiliary building will be accomplished using alternative methods to sump sampling. These methods include the following. A leak will be pinpointed using Class IE sump level indication in the RHR cubicles, containment recirculation cubicles, and the charging pump area of the Auxiliary building. These sump levels indicate in the control room.

Assessment of the radioactive materials released from a leak will be accomplished using the Class 1E process air radiation monitors located in the Auxiliary building and the ESF building. These radiation monitors indicate in the control room.