



THE CONNECTICUT LIGHT AND POWER COMPANY RESTERN MASSACHUSETTS ELECTRIC COMPANY HOLYOKE WATER POWER COMPANY WORTHEAST UTULTES SERVICE COMPANY MORTHEAST NUCLEAR ENERGY COMPANY General Offices • Selden Street, Berlin, Connecticut

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July 18, 1984

Docket No. 50-423 B11273

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) W. G. Counsil to B. J. Youngblood, Millstone Nuclear Power Station, Unit No. 3, Summary/Submittal of Responses to PSB Electrical Draft SER Items, dated June 12, 1984.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3 Submittal of Revised Draft SER Section

Reference 1 provided additional "general clarifications" for Regulatory Guide 1.75 as part of Attachment 2, AM-39, to that letter. As discussed between the NRC Staff reviewer and Northeast Nuclear Energy Company (NNECO) during a May 31, 1984 meeting, these clarifications were found to be acceptable by the NRC Staff. We are therefore forwarding a proposed revision to the Draft SER which should be incorporated into the SER. (See the attachment.)

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

8407300170 840718 PDR ADOCK 05000423 E PDR STATE OF CONNECTICUT)) ss. COUNTY OF HARTFORD)

) ss. Berlin

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.

otary Public

My Commission Expires March 31, 1989

protection requirements of GDC 2 and 4, the single failure requirement of GDC 17, or the guidelines of IEEE Standard 308-1974.

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By amendment 3 to the FSAR, the applicant stated that each redundant safety related system is protected. Based on this statement the staff concludes that Class 1E equipment will meet the protection requirement of GDC 2 and 4 and the single failure requirement of GDC 17 and is, therefore, acceptable. However, FSAR section 8.3.1.4.1 still contains the apparent contradictory statements. Clarification of this item will be pursued with the applicant and the results of the staff review will be reported in a supplement to this report.

8.3.3.2 Compliance With General Design Criterion (GDC) 5 The applicant has met the requirements of GDC 5, "Sharing of Structures, Systems, and Components," with respect to structures, systems, and components of the ac and dc onsite power systems.

8.3.3.3 Physical Independence - Compliance With General Design Criterion (GDC) 17

8.3.3.1 Compliance of Associated Circuits to Requirements of Class 1E Circuits

In Section 1.8 of the FSAR, the following clarification to position C4 of Regulatory Guide 1.75 was identified.

"Associated circuits are identified by the same color code as the Class IE circuits with which they are associated. This color code exists up to and including an isolation device."

Position C4 of Regulatory Guide 1.75 requires that associated circuits (up to and including an isolation device) be subjected to all

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In section 1.8 of the FSAR, the following general clarifications to Regulatory Guide 1.75 were identified.

"Metal clad cable, type MC, utilized in low energy, 120 V ac and 125 V dc nominal circuits and in low density applications is considered adequately protected. As such, the minimum separation between these cables and other cables, or raceway (where required) is 1 in. These cables are further described as follows.

- 1. Type MC cable is a factory assembly of conductors, each individually insulated, enclosed in a metallic sheath of interlocking tape or a smooth or corrugated tube.
- 2. Largest conductor size number 10 AWG.
- 3. No more than 6 conductors.

....

- No more than three number 10 AWG conductors with remaining conductors smaller size.
- Aluminum sheath cable (a Type MC cable in which the aluminum is continuously welded) and/or interlocked armor cable may have an overall jacket of neoprene or hypalon.

Type SO or SJO cords for lighting drops to fixtures are size 12 AWG or smaller and supply 120 V ac or 125 V dc, low energy in low density applications. Adequate protection is provided by 1 in. or greater distance to Class IE raceways.

The staff concludes that these applications for protecting low energy circuits are acceptable in view of the guidelines of IEEE 384 as augmented by Regulatory Guide 1.75.