

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

July 13, 1987

Docket No. 50-423 B11266

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

Reference:

- (1) W. G. Counsil letter to B. J. Youngblood, Submittal of Responses to Draft SER Open Items, dated April 12, 1984.
- (2) W. G. Counsil to B. J. Youngblood, Submittal of Revised Responses to Effluent Treatment System Open Items, dated June 19, 1984.
- (3) W. G. Counsil to B. J. Youngblood, Revised Response to Effluent Treatment System Open Item, dated June 29, 1984.
- (4) B. J. Youngblood letter to W. G. Counsil, Draft SER for Millstone Nuclear Power Station, Unit No. 3, dated December 20, 1983.

Dear Mr. Youngblood:

Millstone Nuclear Power Station, Unit No. 3
Submittal of
Revised Response to Effluent Treatment System Open Item

References (1), (2) and (3) responded to Effluent Treatment System open items identified in Reference (4). As a result of further discussions with the NRC, we

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are providing a revision to ETSB-1 on instrumentation for ESF Atmospheric Cleanup Systems.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY et. al.

BY NORTHEAST NUCLEAR ENERGY COMPANY Their Agent

W. G. Coursil

Senior Vice President

BY: C. F. Sears Vice President

Nuclear and Environmental Engineering

STATE OF CONNECTICUT )
) ss. Berlin
COUNTY OF HARTFORD )

Then personally appeared before me C. F. Sears, who being duly sworn, did state that he is 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

## Open Items

#### Effluent Treatments Branch

# ETSB-1: ESF Atmosphere Cleanup System

- Pressure drop across filter sections is verified to be not more than the Technical Specification pressure drop with a specified flow rate through the filter.
  - o At least once per 18 months.
- 3. In-place testing will establish the design flow with system resistance corresponding to design dirty filter condition. The dp alarm setpoints for each ESF filter train system can be set to correspond to the (-10%) flow condition through the respective filter train system to ensure that during all operating conditions flow is maintained within ±10% of design flow.

The ESF systems fans are fixed speed fans, and the system flow rates vs. pressure drops will be verified during plant operation utilizing the attached fan curves.

4. The surveillance tests and controls described ensure that the pressure drop across filter sections and flow rates through the ESF filters are maintained within the Tech. Spec. limits, which will ensure that the ESF filters will perform their safety function.

With the above system design and surveillance requirements, there are no credible events which would cause the flow to vary such that the filters would not properly function. All of the air operated dampers are designed to fail in the safe position. Manually operated dampers are not postulated to change position. This will insure minimum flow rates through the filters.

# Open Items

### Effluent Treatments Branch

ETSB-1: ESF Atmosphere Cleanup System

SRP Section 6.5.1, Revisions I and 2, and RG 1.52, Revisions 0, 1, and 2, call for each ESF atmosphere cleanup system to be instrumented to signal, alarm, and record pressure drop and flow rate at the control room. Millstone Unit 3 ESF atmosphere cleanup systems are provided with only local pressure differential indicators across each filter with a common alarm in the control room for high pressure differential across the filter bank. The pressure differentials across each filter are transmitted to the plant computer in the main control room. The applicant stated in the FSAR that periodic surveillance tests will be performed to ensure design flow rates through each ESF atmosphere cleanup system. The staff will complete its evaluation after further discussion with the applicant regarding indicators and recorders in the main control room. This issue will be addressed in the final SER. This is an open item.

## Response:

For the ESF atmosphere cleanup system, high differential pressure across a filter section is alarmed in the control room and monitored by the plant computer to identify the section having the high differential pressure. In the event of a high differential pressure alarm, operator action can be taken to start the standby filter train. In addition, the standby system will start automatically if air flow through the filter is low.

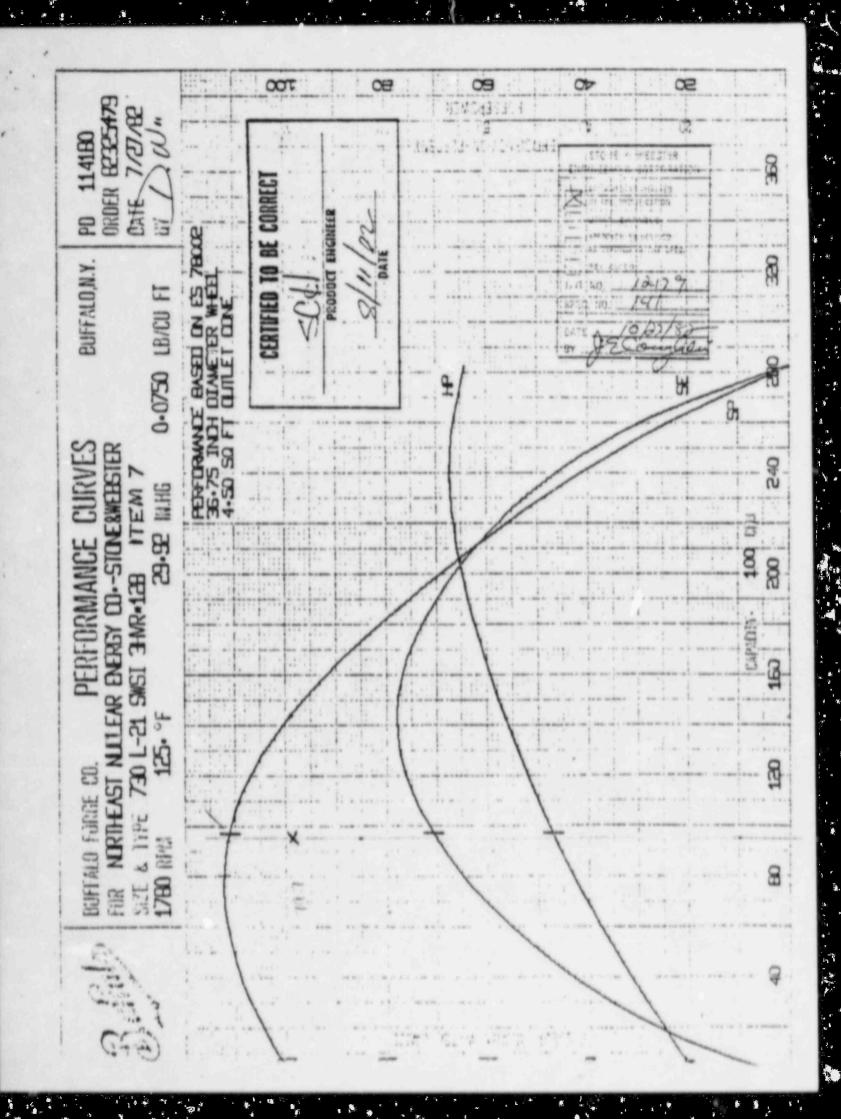
As described in FSAR section 1.9, continuous indication or recording of air flows through individual ESF filtration units is not considered necessary to ensure reliable system operation. Periodic surveillance tests ensure that system balancing is adequate to maintain operating flow rates through filtration units within design limitations. Failure of system fans to function is sensed by flow sensors which automatically start standby units. Sensors to detect high air flow conditions are not necessary since the system is balanced such that the flow is limited to ensure proper performance of the filtration units.

Periodic surveillance tests, as described herein, ensure that system flow rates will be within unit design parameters.

Surveillance tests that will be conducted on ESF atmosphere cleanup systems include the following:

- Filter flow rate verified to be equal or greater than the flow rate as specified in the Technical Specification
  - o At least once per 18 months
  - o After any structural maintenance on the HEPA filter or charcoal absorber housing
  - o Following painting, fire, or chemical release in any ventilation zone communicating with the system while in operation.

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