

November 9, 1995

Docket No. 50-423
B15424

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Secondary Containment — Additional Information

The purpose of this submittal is to clarify the original request made by Northeast Nuclear Energy Company (NNECO) on June 9, 1995,⁽¹⁾ to amend its Operating License, NPF-49, by revising Technical Specification Sections 3.6.6.1 and 3.6.6.2. Specifically, Surveillance Requirement 4.6.6.1.d.3 for attaining a negative pressure in the secondary containment is being relocated to Specification 3.6.6.2, Secondary Containment. This change will recognize the direct impact of boundary integrity on the drawdown capability and will decouple Specification 3.6.6.1 from Specification 3.6.6.2. In addition, Definition 1.12, "Secondary Containment Boundary," is being deleted and included in Bases Section 3/4.6.6, "Secondary Containment." This section is being expanded using the guidance of the improved standard technical specifications (STS) for Westinghouse plants (NUREG-1431).

During a telephone conference call on October 4, 1995, the NRC Staff questioned why NNECO was not specifying a maximum allowable flow rate in the Secondary Containment drawdown surveillance requirement (i.e., Surveillance Requirement 4.6.6.1.d.3 which is being relocated to Specification 3.6.6.2, Secondary Containment). The subject Surveillance Requirement 4.6.6.1.d.3 verifies that one of the trains of the Supplementary Leak Collection and Release System (SLCRS) in conjunction with the Auxiliary Building Filter System (ABFS) will produce a negative pressure of 0.4 inch water gauge in the Auxiliary Building at the 24'-6" elevation within 120 seconds after a start signal (this includes the diesel generator start time and load time).

(1) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Millstone Unit No. 3, Proposed Revision to Technical Specifications — Secondary Containment," dated June 9, 1995.

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In the June 9, 1995, submittal, NNECO proposed to relocate Surveillance Requirement 4.6.6.1.d.3 under the secondary containment boundary technical specification (i.e., new Surveillance Requirement 4.6.6.2.2). This change would recognize the direct impact that boundary integrity has on the secondary containment drawdown capability and would decouple Specification 3.6.6.1 from Specification 3.6.6.2.

This change is consistent with the new improved STS for the Westinghouse plants (NUREG-1431), except the secondary containment drawdown surveillance requirement in the Millstone Unit No. 3 Technical Specifications does not specify a flow rate for the SLCRS fans. The information below provides justification for not specifying a maximum allowable flow rate in the secondary containment drawdown surveillance requirement.

The SLCRS system and fan sizing was based on an estimated infiltration rate. The fan flow rates are verified within a minimum and maximum on a monthly basis. Initial testing verified that the drawdown criteria was met at the lowest acceptable flow rate. Surveillance Requirement 3.6.6.12 of the new standard Technical Specification (NUREG-1431) requires that the drawdown criterion be met while not exceeding a maximum flow rate. It is assumed that the purpose of this flow limit is to ensure that adequate attention is given to maintaining the SLCRS (secondary containment) boundary integrity and not using excess system capacity to offset boundary degradation.

The SLCRS system was designed with minimal margin; therefore, it does not have excess capacity that can be substituted for boundary integrity. Additionally, SLCRS fan flow rates are verified to be acceptable on a more frequent basis than the drawdown test surveillance. Previous testing of the minimum flow rate is acceptable, thus verifying a flow rate during the drawdown test would not provide an added benefit. Historical SLCRS flow measurements show a lack of repeatability associated with the inaccuracies of air flow measurement. As a result, the more reliable verification of system performance is the actual negative pressure generated by the drawdown test and a measured flow rate would add little benefit.

Bases Section 3/4.6.6 has been revised to clarify why no maximum flow rate is necessary in the secondary containment drawdown surveillance requirement.

In addition, the NRC Staff indicated that the statements added to the Action Statements of Specifications 3.6.6.1 and 3.6.6.2, which recognizes the decoupling of these specifications, are unnecessary. It is the NRC's position that this decoupling of Specifications

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3.6.6.1 and 3.6.6.2 could be explained in the Bases of the Millstone Unit No. 3 Technical Specifications. NNECO agrees with the Staff's assessment and, accordingly, the proposed statements to the Action Statements of Specifications 3.6.6.1 and 3.6.6.2, in our submittal dated June 9, 1995, are removed from the proposed changes, and the Bases sections are revised to reflect the above.

Attachments 1 and 2 contains a complete set of marked-up and retyped pages of the technical specifications. These pages reflect the above discussion and changes discussed in our submittal dated June 9, 1995.

The safety assessment, significant hazards consideration, and environmental impact statement contained in the June 9, 1995, submittal remain valid and do not need to be revised to support the attached changes.

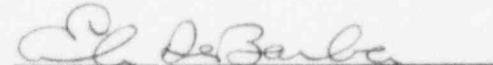
There are no commitments contained in this letter. If you should have any questions, please contact Mr. R. G. Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR J. F. Opeka
Executive Vice President

BY:



E. A. DeBarba
Vice President

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
P. D. Swetland, Senior Resident Inspector, Millstone Unit
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Subscribed and sworn to before me

this 9th day of November, 1995

Gerard P. van Noorden

Date Commission Expires: 12/31/97

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Attachment 1

Millstone Nuclear Power Station, Unit No. 3

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Marked-up Pages

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