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MP-92-408

Docket No. 50-423
Re: 10CFR50.73

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Reference: 1. S. E. Scace Letter to the NRC, Licensee Event Report 92-005-00, dated March 24, 1992

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Omission of The RCS Depressurization Function From
The Technical Specification (TS) Requirements For Remote Shutdown Capability

In a letter dated March 24, 1992, (Reference 1), Northeast Nuclear Energy Company (NNECo) submitted a License Event Report (LER) concerning a failure to test the Power Operated Relief Valves (PORVs) as described in the Millstone 3 Final Safety Analysis Report (FSAR) during the initial test program. In Reference 1 it was also stated that some equipment, which is required for performing a remote shutdown outside the Control Room, may not have been included in the Millstone 3 Technical Specifications (TS). Due to an oversight, a statement was made in LER-92-005 that a Special Report has been issued to the NRC to document the omission and to describe the actions which are being taken. On the contrary, this was not done. The purpose of this letter is to submit that Special Report to document that although certain equipment is not specified in the TS, the equipment is capable of performing its function from remote location outside the Control Room (i.e., Auxiliary Shutdown Panel, ASP).

Specifically, this Special Report documents equipment not included in TS Table 3.3-9, REMOTE SHUTDOWN INSTRUMENTATION. TS 3.3.3.5 requires the transfer switches, power, controls and monitoring instrumentation channels shown in Table 3.3-9 to be operable in Modes 1, 2, and 3. The Power Operated Relief Valves (PORVs), PORV Block Valves, Safety Injection Accumulator Tanks Isolation Valves, and Safety Injection Accumulator Tanks Vent/Supply Valves have no TS operability or surveillance test requirements for remote operation even though they are capable of remote operation from the Auxiliary Shutdown Panel (ASP), and they require remote operation to depressurize the Reactor Coolant System for cold shutdown decay heat removal under certain postulated events. The controls and instrumentation on the ASP are used to help achieve and maintain a safe shutdown in the event that an evacuation of the Control Room is required. Except for the loss of offsite power, a Control Room evacuation is not considered to occur coincident with a design basis accident.

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An Independent Safety Engineering Group evaluation of the test program for the Cold Overpressure Protection System initially discovered that the PORVs were not included on Table 3.3-9. A review of the Millstone 3 FSAR was then performed in order to determine if any other components were not included on the table. This review identified that the PORV Block Valves and Safety Injection Accumulator Valves were also not included on the table. The PORVs, PORV Block Valves, and Accumulator Tanks Vent/Supply Valves have been satisfactorily operated from the ASP subsequent to the discovery. The Safety Injection Accumulator Tank Isolation Valves will be tested from the ASP when TS allows closure of the valves (pressurizer pressure less than 1000 psig).

The root cause is due to an administrative oversight during the TS submittal process prior to commercial operation. The requirements for Cold Shutdown outside the Control Room were evolving while Millstone Unit 3 was under construction. The Westinghouse standard TS, which is the basis for the Millstone 3 TS, does not provide a specific requirement for testing instrumentation or equipment associated with the ASP. Therefore, the oversight is considered to be unique, and not indicative of inadequate TS.

A TS change will be processed to include the omitted valves in TS Table 3.3-9 and will be submitted to the NRC for approval. In the meantime, Millstone Unit 3 is administratively testing the PORVs, PORV Block Valves, and Safety Injection Accumulator vent valves on the same frequency as TS Table 3.3-9.

All valves except the Safety Injection Accumulator Tanks Isolation Valves have recently been confirmed to operate satisfactorily from the ASP. Although these Isolation Valves cannot be tested now, they were satisfactorily operated from the ASP during the initial startup testing. Safety Injection Accumulator Tank pressure can be removed by venting nitrogen via the control vent valves making isolation unnecessary. The Safety Injection Accumulator vent valves provide redundant train independent means of depressurizing the accumulators. This ability is a design feature of the plant since the isolation valves are not available after all accidents.

Based on testing performed during the initial startup program and the acceptable as-found conditions, the omission of the depressurization function from the TS surveillance requirements has a minimal safety impact.

The licensee contact for this Special Report is Nelson Hulme, who may be contacted at (203) 444-5398.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

Stephen E. Scace
Director, Millstone Station

SES/NDH:clc

cc: T. T. Martin, Region I Administrator
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