

NORTHEAST UTILITIES



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May 1, 1992

Docket No. 50-423

B14121

Re: 10CFR50.90

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

Reference: D. H. Jaffe letter to E. J. Krocza, Issuance of Amendment
No. 62, dated September 3, 1991.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Snubber Visual Inspection Intervals

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend Operating License NPF-49 by incorporating the change identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 3.

Description of the Proposed Changes

The proposed amendment revises the visual inspection surveillance requirements associated with the snubbers. Specifically, it is proposed to delete the following from the Millstone Unit No. 3 Technical Specification Section 4.7.10.b: "and the first inspection interval determined using this criterion shall be based upon the previous inspection interval as established by the requirements in effect before Amendment 62."

This proposed change would allow NNECO to utilize the results of inspections performed during the Millstone Unit No. 3's third refueling outage, in conjunction with Technical Specification Table 4.7-2 as a baseline for determining subsequent inspection intervals rather than the interval which was in effect before Amendment No. 62.

During Millstone Unit No. 3's third refueling outage, snubbers were visually inspected in accordance with technical specification requirements. Of approximately 900 snubbers inspected, 7 were classified as failures. Functional testing of these components resulted in only one failure, which was due to a drag load in excess of accepted limits. Based upon these results, the subsequent visual inspection interval was set at 12 months (± 25 percent of that period), beginning April 12, 1991. This interval was set according to the inspection interval requirement in effect at that time. This inspection interval has now arrived. Since the majority of these snubbers are located

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inside containment and in radiation areas, performing the inspection at this time would require approximately a 2-week cold shutdown of the plant. It is noted that on September 3, 1991 (Reference), the NRC issued Amendment No. 62 to the Millstone Unit No. 3 Operating License in response to NNECO's request dated June 25, 1991. This amendment provides an alternate method for determining the next interval for the visual inspection of snubbers. This is based upon the number of unacceptable snubbers found during previous inspections, the total population or category size for each snubber type, and the previous inspection interval. According to the new criterion of Table 4.7-2 of the Millstone Unit No. 3 Technical Specifications, a single, confirmed visual failure in a given group would allow an extension to twice the previous interval. Since the previous interval was 18 months, and there was only one visual failure during the third refueling outage, this would result in a 36-month interval before snubbers would have to be visually inspected, allowing NNECO to perform inspections during the fourth refueling outage (currently scheduled for June 1993) and thus, potentially preventing an unscheduled plant shutdown for this purpose.

Safety Assessment

Performance of periodic visual inspections of snubbers complements the existing functional testing program and provides additional confidence in snubber operability. The proposed change would allow NNECO to utilize the results of inspections performed during Millstone Unit No. 3's third refueling outage, in conjunction with Technical Specification Table 4.7-2 rather than the interval which was in effect before Amendment No. 62. The previous criterion for the visual inspection interval assumed an 18-month refueling interval which did not account for the trend to longer fuel cycles or the impact of extended outage. By letter dated December 11, 1990, the NRC Staff issued Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." GL 90-09 provides an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and generally will allow the licensee to perform visual inspections and corrective actions during plant outages. Because the proposed change will reduce the occupational radiation exposure and is highly cost effective, the increase in the inspection schedule as allowed by GL 90-09 is consistent with the Commission's policy statement on technical specification improvements.

In addition, NNECO performed limited visual inspections in December 1991 since plant conditions allowed earlier than the required interval (i.e., 12 months \pm 25 percent). The inspections were performed only on the small (Pacific-Scientific PSA-1/4 and PSA-1/2) snubber population, due to their susceptibility to high drag loadings resulting from corrosive environmental conditions. All 229 snubbers, both accessible and inaccessible, in this grouping were inspected with no visual signs of damage or impaired operability. The results of these inspections provide an increased level of confidence that operability will be maintained until Millstone Unit No. 3's fourth refueling outage.

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.92 and concluded that the change does not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed change does not involve a significant hazards consideration because the change would not:

1. Involve a significant increase in the probability or consequences of an accident previously analyzed.

The proposed change will have a negligible effect upon the probability of occurrence of accidents previously evaluated. Although the snubber visual inspection cycle is being lengthened, it provides essentially the same confidence level as the original schedule when performed in conjunction with snubber functional testing. The snubber functional testing program acts to provide a 95 percent confidence level that 90 to 100 percent of the snubber population will operate within specified acceptance limits. Visual examinations are a separate process which tend to complement the functional testing program. The visual inspections, alone, have a negligible effect upon the reliability of snubbers. In addition, the ACTIONS required by the existing technical specifications as a result of finding snubbers inoperable remains the same. Therefore, the proposed change does not affect the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

The proposed change does not affect any plant operations, the potential for an unanalyzed accident is not created, and no new failure modes are introduced. The proposed change will not affect the operability of the snubbers to perform their intended function during normal or accident conditions.

3. Involve a significant reduction in the margin of safety.

The inspection schedule defined in Technical Specification Table 4.7-2 provides the same level of confidence as the previous schedule (i.e., criterion in effect prior to Amendment No. 62). Snubber functional testing provides a 95 percent confidence level that 90 to 100 percent of the snubbers will operate within specified acceptable limits. Visual inspections act only to complement and reinforce the functional testing program. In addition, the proposed change does not affect any of the ACTIONS specified in the technical specifications which result from identification of inoperable snubbers. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51FR7751) of amendments that are considered not likely to involve a significant hazards consideration. Although the proposed change is not enveloped by a specific example, the change would not involve a significant increase in the probability or consequences of an accident previously analyzed. The increase in the inspection interval for the visual inspection maintains the same confidence level as the existing schedule when coupled with functional testing, while allowing the flexibility to perform the visual inspections and corrective actions at the extended intervals. This will reduce the future occupational radiation exposure and this inspection schedule is consistent with the Commission's policy statement on technical specification improvements.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved the proposed change and has concurred with the above determination.

The retype of the proposed change to technical specifications in Attachment 1 reflects the currently issued version of technical specifications. Pending technical specification changes or technical specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with technical specifications prior to issuance.

Revision bars are provided in the right-hand margin to indicate a revision to the text. No revision bars are utilized when the page is changed solely to accommodate the shifting of text due to additions or deletions.

The visual inspection interval in effect at this time requires NNECO to complete the visual inspection on or before July 12, 1992, but the proposed change, if approved, will allow NNECO to perform the visual inspection during the fourth refueling outage. Therefore, NNECO hereby requests the NRC Staff process and issue this proposed amendment by July 12, 1992, to be effective upon issuance.

In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

