NORTHEAST UTILITIES
THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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May 20, 1992

Docket No. 50-423
B14108
Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Reactivity Controls, Reactor Coolant System, and Refueling Operations

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

Description of Proposed Changes

- Figure 3.1-5: Required Shutdown Margin for Mode 5 with RCS Loops Not Filled. This proposed change revises the title of the figure from "loops drained" to "loops not filled" to be consistent with the wording of Technical Specification Sections 3.1.1.1.2, 3.1.1.2, and 3.4.1.4.2.

- Section 3.4.1.3: Reactor Coolant System--Hot Shutdown. The requirement to have two reactor coolant pumps (RCPs) operating in Mode 4 is being changed to require three RCPs operating with the reactor trip breakers closed. This requirement is more restrictive than the existing Technical Specifications, but is consistent with the safety analysis performed for Cycle 4 and Technical Specification Section 3.4.1.2.

- Section 4.4.1.3.3: Reactor Coolant System--Hot Shutdown Surveillance Requirements. The proposed change will revise the wording of the surveillance requirement to ensure that the required number of reactor coolant loops are verified in operation. The proposed change to Technical Specification Section 3.4.1.3 (previously discussed) will require that three reactor coolant loops are in operation, whereas the existing surveillance (4.4.1.3.3) only requires that "at least one reactor coolant loop or RHR loop" be verified in operation. This proposed change makes the surveillance requirement consistent with the requirements of the Technical Specifications.

- Section 3/4.4.1.4.2: Reactor Coolant System--Cold Shutdown--Loops Not Filled. Having the requirement to isolate the Chemical and Volume Control System (CVCS) within this Technical Specification is confusing since this specification also references back to Technical Specification Section 3.1.1.2, which provides the actual requirements and basis for isolating the CVCS based upon shutdown margin requirements. This change will make the requirements of Technical Specification Section 3/4.4.1.4.2 consistent with those requirements of Section 3.1.1.2, and, therefore, preclude any confusion.

- Section 3/4.9.1.1: Refueling Operations--Boron Concentration. The proposed change will require that valve 3CHS*V305 be closed in addition to those valves specified in Technical Specification Section 4.4.1 4.2.3. This change will result in a more restrictive requirement and will be consistent with the safety analysis and Technical Specification Sections 4.1.1.1.2.2 and 4.1.1.2.2.

Significant Hazards Consideration

NNECO has reviewed the proposed changes in accordance with 10CFR50.90 and has concluded that the changes do 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 changes do not involve a significant hazards consideration because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously analyzed. The proposed changes either provide clarification and ensure consistency with our Technical Specifications or are more restrictive requirements that provide greater assurance that systems will be able to perform their function. There are no hardware changes associated with these proposed changes. There is no increase in the probability or consequences of any previously analyzed accident.

2. Create the possibility of a new or different kind of accident from any previously evaluated. The proposed changes clarify the requirements of the Technical Specifications and do not change conditions sufficiently to create an accident of a different type than previously evaluated.

3. Involve a significant reduction in the margin of safety. Since the changes do not affect the consequences of any accident previously analyzed, there is no reduction in the margin of safety.

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 changes are not enveloped by a specific example, the changes would not involve a significant increase in the probability or consequences of an accident previously analyzed. No physical modifications to equipment have been made. The proposed changes are intended to enhance the Technical Specifications by

either providing more restrictive surveillance requirements or clarifying Technical Specifications to achieve consistency with other sections of the Technical Specifications.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do 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 changes meet 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 changes and has concurred with the above determination.

The attached retype of the proposed changes to the Technical Specifications reflects the currently issued version of the 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.

Regarding our schedule for this amendment, we request issuance at your earliest convenience with the amendment effective within 30 days of issuance.

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

Should you have any questions, please contact my staff.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

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

Then personally appeared before me, J. F. Opeka, who being duly sworn, did state that he is Executive Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Lorraine J. D'Amico
Notary Public

My Commission Expires March 31, 1993