

NORTHEAST UTILITIES



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

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July 31, 1992

Docket No. 50-423

B14104

Re: 10CFR50.90

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

- References:
- (1) Generic Letter 86-10, dated April 24, 1986, Implementation of Fire Protection Requirements.
 - (2) Generic Letter 88-12, dated August 2, 1988, Removal of Fire Protection Requirements from Technical Specifications.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Fire Protection: Technical Specifications and License Conditions

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License, NPF-49, by incorporating the changes identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 3 and the changes identified in Attachment 2 into the Operating License.

Description of Proposed Change

This change revises the NPF-49 License Condition 2.C.7; Technical Specifications 1.14, 3.3.3.7, 3.7.12, 4.7.12, 3.7.13, 4.7.13, 6.2.2.f, 6.5.1.6.k and Technical Specification Tables 3.3-11, 3.7-4, 3.7-5; and Bases 3.7.12 and 3.7.13. Each change is delineated below:

License Condition 2.C.7 has been deleted in its entirety and replaced with a new Condition 2.I. Condition 2.C.7 relates to the implementation and maintenance of the approved Fire Protection Program. Whereas Condition 2.C.7 provides that 10CFR50.90 is the mechanism for obtaining NRC approval of changes to the approved Fire Protection Program which would significantly decrease the level of fire protection in the plant, Condition 2.I permits changes to the approved Fire Protection Program without prior NRC approval if the changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. The Condition 2.I is consistent with the wording provided in Reference 1.

In conjunction with the changes to the license, and in accordance with Reference (1), Technical Specification provisions related to the Fire Protection

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Program are being deleted and placed in plant operating procedures. The definition(s), limiting condition for operation, and surveillance requirements for fire protection equipment and the requirements for fire brigade training are being placed in the Millstone Unit No. 3 Operating Procedure OP-3273, Technical Requirements--Supplementary Technical Specifications. A change to OP-3273 will require a 10CFR50.59 evaluation. Further, changes to Section 6 Administrative Control of the Technical Specifications provide that any changes to the Fire Protection Program and implementing procedures are reviewed by either the Plant Operations Review Committee (PORC) or the Site Operations Review Committee (SORC) as are other changes to the Technical Specifications.

The following specific changes are being made:

Technical Specification 1.14 which provides the definition of a fire protection operational test will be deleted. This definition will be incorporated in the Operating Procedure OP-3273. An indication that this provision has been deleted will remain.

Technical Specifications related to Fire Detection Instrumentation including Limiting Condition for Operation 3.3.3.7, Surveillance Requirements 4.3.3.7.1 and 4.3.3.7.2, and Table 3.3-11 referred to in the Limiting Condition for Operation 3.3.3.7 will be deleted in their entirety. The provisions of these Technical Specifications will be incorporated in OP-3273. This deletion will result in pages 3/4 3-64, 3/4 3-65, 3/4 3-66 and 3/4 3-67 remaining but containing only the words "This page intentionally left blank." The corresponding Bases Section 3/4.3.3.7, Fire Detection Instrumentation will be deleted and so indicated on page B 3/4-5.

Technical Specifications related to Fire Suppression Systems, Fire Suppression Water System including Limiting Conditions for Operation 3.7.12.1, Surveillance Requirements 4.7.12.1.1, 4.7.12.1.2 and 4.7.12.1.3 will be deleted in their entirety. The provisions of these Technical Specifications will be incorporated in OP-3273. This deletion will result in pages 3/4 7-30, 3/4 7-31, and 3/4 7-32 remaining but containing only the words "This page intentionally left blank."

Technical Specifications related to Plant Systems, Spray and/or Sprinkler Systems including Limiting Conditions for Operation 3.7.12.2 and Surveillance Requirements 4.7.12.2 will be deleted in their entirety. The provisions of these Technical Specifications will be incorporated in OP-3273. This deletion will result in pages 3/4 7-33 and 3/4 7-34 remaining but containing only the words "This page intentionally left blank."

Technical Specifications related to Plant Systems, CO₂ Systems including Limiting Conditions for Operations 3.7.12.3, Surveillance Requirements 4.7.12.3.1 and 4.7.12.3.2 will be deleted in their entirety. The provisions of these Technical Specifications will be incorporated in OP-3273. This

deletion will result in pages 3/4 7-35 and 3/4 7-36 remaining but containing only the words "This page intentionally left blank."

Technical Specifications related to Plant Systems, Halon Systems including Limiting Conditions for Operation 3.7.12.4 and Surveillance Requirements 4.7.12.4 will be deleted in their entirety. The provisions of the Technical Specifications will be incorporated in OP-3273. This deletion will result in pages 3/4 7-37 remaining but containing only the words "This page intentionally left blank."

Technical Specifications related to Plant Systems, Fire Hose Stations including Limiting Conditions for Operation 3.7.12.5, Surveillance Requirements 4.7.12.5 and Table 3.7-4 referred to in the Limiting Conditions for Operation 3.7.12.5 will be deleted in their entirety. The provisions of the Technical Specifications will be incorporated in OP-3273. This deletion will result in pages 3/4 7-38, and 3/4 7-39 remaining but containing only the words "This page intentionally left blank."

Technical Specifications related to Plant Systems, Yard Fire Hydrants and Hydrant Hose Houses including Limiting Conditions for Operation 3.7.12.6, Surveillance Requirements 4.7.12.6 and Table 3.7-5 referred to in the Limiting Conditions for Operation 3.7.12.6 will be deleted in their entirety. The provisions of the Technical Specifications will be incorporated in OP-3273. This deletion will result in pages 3/4 7-40 and 3/4 7-41 remaining but containing only the words "This page intentionally left blank."

The Bases Section 3/4.7.12 Fire Suppression Systems which corresponds to the above Technical Specifications on Plant Systems will be deleted and so indicated on page B 3/4 7-7.

Technical Specifications related to Plant Systems, Fire Rated Assemblies including Limiting Conditions for Operation 3.7.13, Surveillance Requirements 4.7.13.1 and 4.7.13.2 will be deleted in their entirety. The provisions of the Technical Specifications will be incorporated in OP-3273. This deletion will result in pages 3/4 7-42 and 3/4 7-43 remaining but containing only the words "This page intentionally left blank." The corresponding Bases Section 3/4 7-13, Fire Rated Assemblies will be deleted and so indicated on page B 3/4 7-8.

Technical Specification 6.2.2.f relating to the site Fire Brigade will be deleted and incorporated in OP-3273. The deletion will be noted on page 6-2. In addition, the asterisk note on the bottom of page 6-2 will be modified to delete reference to the Fire Brigade.

Technical Specification 6.4.2 related to a training program for the Fire Brigade will be deleted in its entirety. The provisions of these Technical Specifications will be incorporated in OP-3273. This deletion will be so noted on page 6-7.

Two additions will be made to Technical Specification 6.0. Technical Specification 6.5.1.6(k) will be added to include the review of the Fire Protection Program and implementing procedures as an additional responsibility of the PORC. Technical Specification 6.5.2.6.i will be added to include the responsibility for review of the common site Fire Protection Program and implementing procedures by the SORC.

Safety Assessment

The requirements of the deleted technical specifications will be moved in their entirety to plant operating procedures. The requirements will be placed in the Millstone Unit No. 3 Operating Procedure OP-3273, Technical Requirements--Supplementary Technical Specifications. A change to a fire protection requirement in Operating Procedure OP-3273 will require a 10CFR50.59 evaluation to be performed. The 10CFR50.59 evaluation involves a review of the three actions in 10CFR50.59(a)(2) to determine if the proposed change involves an unreviewed safety question.

The modifications to Technical Specification 6.5.1.6 provides specifically that the PORC is responsible for review of the unit's Fire Protection Program and implementing procedures. Similarly the modifications to Technical Specification 6.5.2.6 provides specifically that the SORC is responsible for review of the common site Fire Protection Program and implementing procedures not reviewed by PORC.

These changes are administrative in nature in that no Fire Protection Program requirements are being altered. The requirements are being placed in documents other than the Technical Specifications and License in accordance with References (1) and (2).

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed changes and has concluded that they do not involve a significant hazards consideration. The bases 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 evaluated.

The proposed changes simply remove the provisions of the Fire Protection Program that are contained in the Technical Specifications and License and places them in the plant operating procedures. Review of the Fire Protection Program and its revisions will be the responsibility of the PORC and SORC, just as it has always been the responsibility of these groups to review changes to fire protection requirements when they were part of the Technical Specifications.

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

There are no new failure modes associated with the proposed changes. Since the plant will continue to operate as designed, the proposed changes will not modify the plant response to the point where it can be considered a new accident.

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

No change is being proposed for the Fire Protection Program requirements themselves. The relevant Technical Specifications are being deleted, and the requirements contained therein are being incorporated into the operating procedures. Plant procedures will continue to provide the specific instructions necessary for the implementation of the requirements, just as when the requirements resided in the Technical Specifications. Fire Protection Program changes will be governed by the provisions of 10CFR50.59, and 10CFR50.71(e).

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) 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 proposed changes would not involve a significant increase in the probability or consequences of an accident previously analyzed. As previously stated, the removal of the Fire Protection-related Technical Specifications from the Technical Specifications has no adverse impact upon plant operation or safety. Since operability and surveillance requirements are still contained in the plant procedures, the changes do not reduce the effectiveness of Technical Specification requirements. In addition, the Fire Protection Program requirements will be maintained in a plant procedure. Any changes to the Fire Protection Program requirements will be made in accordance with the provisions of 10CFR50.59.

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 retype of the proposed changes to Technical Specifications and the Operating License in Attachments 1 and 2 reflect the currently issued version of Technical Specifications and the operating license. Pending Technical Specification Changes, or Technical Specification changes or the Operating License changes issued subsequent to this submittal are not reflected in the enclosed

U.S. Nuclear Regulatory Commission
B14104/Page 6
July 31, 1992

retype. The enclosed re-type should be checked for continuity with Technical Specifications and the Operating License 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.

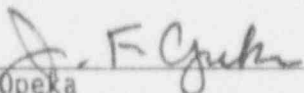
The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved this proposed amendment and concurs with the above determination.

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

Regarding our proposed schedule for this amendment, we request issuance at your earliest convenience with amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



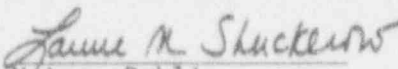
J. F. Opeka
Executive Vice President

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

Mr. Kevin McCarthy, Director
Radiation Control Unit
Department of Environmental Protection
Hartford, Connecticut 06116

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.



Laurie M. Shuckert
Notary Public
My Commission Expires 3/31/96