NORTHEAST UTILITIES

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September 22, 1992

Docket No. 50-423
B14213

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
Seismic Monitoring Instrumentation Measurement Range

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.

Background

On September 5, 1991, NNECO personnel discovered that the range of the installed 'A' safety injection accumulator tank discharge line triaxial peak recording accelerograph, 3ERS-PAS28, was not in compliance with the range specified on Technical Specification Table 3.3-7. Specifically, the range of the triaxial peak recording accelerograph installed as 3ERS-PAS28 was ±2g vice ±1g range required by Technical Specification Table 3.3-7. A review of the discrepancy revealed that the original accelerograph installed during the plant's initial operation (from January 1986 through March 1987) was a ±1g range. During the first refueling outage, a ±2g range triaxial peak accelerograph was installed on March 18, 1987. No immediate actions were required by the plant operators in response to this event and the event was reported via Licensee Event Report (LER) 91-024-01. A ±1g range accelerograph was installed by September 6, 1991, to comply with the technical specification requirement. Further review of the design basis seismic response spectra for the anticipated safe shutdown earthquake (SSE) response acceleration for the 'A' safety injection accumulator tank discharge line indicated that a ±2g instrument range was applicable. Based on the information, a ±2g range accelerograph was installed as 3ERS-PAS28 on November 7, 1991. As committed in LER 91-024-01, NNECO hereby proposes to amend the Millstone Unit No. 3 Technical Specification Table 3.3-7 to indicate the correct (±2g) range for device 3ERS-PAS28. The installed instrument (3ERS-PAS28) remains functional but inoperable pending the proposed amendment request. It is noted that a

A001

special report dated September 25, 1991, was submitted to the NRC to document the triaxial peak recording accelerograph being inoperable for a period greater than 30 days.

Description of the Proposed Change

The proposed amendment revises the measurement range associated with seismic monitoring instrumentation. Specifically, it is proposed correct the measurement range from ±1g to ±2g for triaxial peak accelerograph (Item 2b): "P/A2 Safety Injection Accumulator Discharge Line (-22' 10")."

Based on the anticipated SSE horizontal (1g) and vertical (1.3g) acceleration values from the response spectra of containment, a ±2g instrument range is required to envelope the anticipated response.

Safety Assessment

The proposed technical specification change is to Table 3.3-7, "Seismic Monitoring Instrumentation." The measurement range of one of the triaxial peak accelerographs (P/A2) is being increased from ±1g to ±2g. This change is consistent with the anticipated maximum response at this location during an SSE. The triaxial peak accelerographs are used to obtain building/equipment response data following an earthquake and do not impact the operation of the power plant. In the original configuration, the ±1g range accelerograph could have gone off scale and yielded invalid data, but this would be obvious, and thus no evaluations would have utilized this information. There are eight other active/passive devices available for seismic motion assessment on Millstone Unit No. 3. The nonsafety-related triaxial peak recording accelerographs are used to provide qualitative seismic motion data to compare against analog seismic instrumentation and are considered to be the lowest order with respect to the level of data reliability when compared to the time-history accelerographs and response spectrum recorders. Because more reliable seismic motion data would be still available and the instruments are used for qualitative comparison assessment purposes, the event did not pose an adverse impact on the plant operation. In the proposed configuration, the instrument will be able to monitor within the full anticipated range of the response of the structure. The technical specification change is considered safe since the change does not alter the plant operation but only impacts one piece of instrumentation which collects data during and following a seismic event.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed change and has concluded that it 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 evaluated.

   The proposed change to Table 3.3-7 involves an increase in the range of a seismic monitoring instrument. The instrument does not increase the probability or consequences of an accident previously analyzed because it is used to obtain building/equipment response data during and following an earthquake and does not impact the operation of the power plant.

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

   The seismic monitoring instrument's sole function is to record data. The modification will increase the range of the existing instrument; thus, should a seismic event occur, the motion of the plant will be accurately recorded thereby enabling the status of the plant to be adequately assessed after the event.

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

   The proposed change involves an increase in range from a $\pm$1g to $\pm$2g. The change does not reduce the margin of safety, but rather increases it by providing plant personnel with accurate data that previously was unattainable with the old instrument range.

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 change is not enveloped by a specific example, the proposed change would not involve a significant increase in the probability or consequences of an accident previously analyzed because the instrument involved is used only as a monitoring device and has no function in accident mitigation.

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 increases the types and amounts of effluents that may be released off-site, nor significantly increases 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 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 the amendment effective as of the date of issuance, to be implemented within 30 days of issuance.

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
P. D. Swetland, 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.

Notary Public

My Commission Expires March 31, 1993