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November 18, 1992

Docket No. 50-423
B14291

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 Specification
Containment Leakage

By letter dated November 18, 1992,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) submitted a request for a one-time exemption from the scheduler requirements of Appendix J, Section III.D.2(a) and III.D.3, which specifies a periodic testing interval for Type B and Type C containment testing of 24 months. This exemption request was necessary because of the unusually long maintenance outage (service water system work and erosion/corrosion work) during 1991, and 2 limited duration outages in 1992, which will result in the periodic Type B and Type C tests exceeding the specified 24-month testing interval by approximately 8 to 10 months, if not performed before the 1993 refueling outage which is presently scheduled to commence in September 1993. This will require a change to the Millstone Unit No. 3 Technical Specifications to implement this one-time exemption request by revising Technical Specification Sections 4.6.1.2.d and 4.6.1.2.e to allow exceeding the required 24-month surveillance interval by 10 months for this cycle only.

Pursuant to 10CFR50.90, 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.

Description of the Proposed Change

The purpose of this change is to allow Millstone Unit No. 3 to exceed the specified surveillance interval of 24 months for Type B and Type C containment

(1) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "10CFR50, Appendix J, Request for Exemption," dated November 18, 1992.

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penetration testing by 10 months for this cycle only. Technical Specifications Surveillance Requirement Sections 4.6.1.2.d and 4.6.1.2.e of page 3/4 6-3 will be revised as follows:

1. An asterisk will be added to the following requirement of Section 4.6.1.2.d "...at intervals no greater than 24 months(*)...." and an asterisk will be added to the following requirement of Section 4.6.1.2.e "...at least once per 24 months(*)...."
2. A footnote will be added to the bottom of page 3/4 6-3 to read: "(*) the 24-month interval for Type B and Type C test has been increased to 34 months for Cycle 4 only."
3. A typographical error in Section 4.6.1.2.e is also corrected (i.e., "change from 'Pa, 53.27 psig [38.57 psig]' to Pa, 53.27 psia [38.57 psig]"). NNECO considers this change to be administrative in nature and, therefore, a separate discussion regarding significant hazards consideration is not provided.

Millstone Unit No. 3 commenced its last refueling outage in February 1991. The most recent Type B testing began on January 22, 1991. There are 84 Type B penetrations; this includes the personnel air lock. Of the 84 penetrations, 80 are electrical penetrations which can be tested at power. Of the four remaining penetrations, two penetrations--the equipment hatch and equipment hatch manway--were tested on November 16, 1991, and January 28, 1992, respectively. The third penetration, the personnel air lock, is covered under Technical Specification 3.6.1.3 and is therefore not the subject of this request. Currently there are plans to begin Type B testing of the remaining penetrations in November 1992, and to complete the testing prior to January 22, 1993. The only penetration that cannot be Type B tested at power, the fuel transfer canal blind flange, will require an extension. Type B testing of this penetration was performed on March 18, 1991. In a letter dated November 18, 1992, NNECO has submitted a request for a one-time exemption from the schedular requirements of Appendix J, Section III.D.2(a), for this penetration.

The most recent Type C testing began on February 5, 1991. The 24-month time limit specified in Technical Specifications 4.6.1.2.d and 4.6.1.2.e governing Type B and Type C leakage testing will expire on February 5, 1993. Due to an unusually long maintenance outage (service water system work and erosion/corrosion work) during 1991, and 2 limited duration outages in 1992, NNECO has rescheduled the next refueling outage from November 1992 to September 1993. Commencing Type B and Type C testing, as scheduled during the next refueling outage, would exceed the specified 24-month testing interval by 8 to 10 months, depending on the penetrations to be tested. In January, May, and October 1992, while shut down, Type C testing was satisfactorily performed on 31 penetrations. The remaining 37 penetrations will be Type C tested in the next

refueling outage. An appropriate exemption request⁽²⁾ has been submitted to the NRC to cover the above 37 penetrations.

Safety Assessment

Although NNECO considers the 24-month "clock" to have commenced with the first performed Type B and Type C test on January 22, 1991, and February 5, 1991, respectively, only one penetration whose Type B test, and only 37 penetrations whose Type C tests, were performed in the last refueling outage, would actually exceed the 24 month testing interval. The remaining penetrations will actually be retested or have been tested within 24 months of their previous Type B and Type C testing.

The past Millstone Unit No. 3 local leak rate test (LLRT) data (Type B and Type C), in general, demonstrated good leak rate test results. Specifically, during the last refueling outage, the total Type B and C leakage rate is 233,679.2 SCCM. This value is approximately 37.4 percent of the technical specification limit of 624,762.67 SCCM (0.6 L_g). The total bypass B and C leakage value is approximately 17,810 SCCM, which is approximately 40.7 percent of the technical specification limit of 43,735 SCCM (0.042 L_g).

In addition, the last Millstone Unit No. 3 containment integrated leakage rate test (ILRT) completed on July 7, 1989, indicated that the "As-Left" ILRT leakage rate, which measures the leakage of all potential paths, including Type B and Type C penetrations, was 0.29 weight percent per day. This value is 44.6 percent of the technical specification limit of 0.65 weight percent per day, thereby demonstrating that the overall leak tightness of containment and its protective boundaries is maintained.

The proposed change will allow the Type B and Type C testing interval, for Cycle 4 only, to be extended from 24 months to 34 months. NNECO believes that the previous Type B and Type C results, and the results of the previous Type A test, provide adequate assurance that containment integrity will not be significantly degraded because of the one-time extension. The proposed change does not alter the testing criteria or any acceptance criteria; it only extends the time period between the test performance, and hence no design basis analyses are affected by this proposed change.

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

(2) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "10CFR50, Appendix J, Request for Exemption," dated November 18, 1992.

compromised. The proposed change does not involve a significant hazards consideration because the change would not:

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

The past Millstone Unit No. 3 LLRT data, in general, demonstrated good leak rate results. Specifically, during the last refueling outage, the total Type B and Type C leakage rate was 37.4 percent of the technical specification limit. In addition, the last Millstone Unit No. 3 ILRT test completed on July 7, 1989, indicated that the "As-Left" leakage ILRT rate is 44.6 percent of the technical specification limit. This demonstrates that the overall leak tightness of containment and its protective boundaries is maintained. No operations are known to have occurred which would suggest a significant degradation of containment integrity.

The change does not increase the probability of any accident, since a design basis accident is not a function of surveillance test intervals.

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

The containment isolation features limit the consequences of any accident. The addition of 8 to 10 months to the test schedule should have no impact on this. The proposed change does not alter the testing criteria or any acceptance criteria, it only extends the time period between the test performance. Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created. No new failure modes are introduced.

3. Involve a significant reduction in margin of safety.

As discussed above, the past Type B and Type C and the containment ILRT results demonstrate that the overall leak tightness of the containment and its protective boundaries is maintained. Also, since the change does not affect the consequences of an accident previously analyzed, there is no reduction in the margins of safety.

Moreover, the Commission has provided guidance concerning the application of the 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 change proposed herein is not enveloped by a specific example, the proposed change is a one-time change and is applicable to this cycle only and will not significantly increase the probability or consequences of any accident previously evaluated, and will not create a new or different type of accident than any previously evaluated. It is noted that a similar technical specification change related to the Type B and C testing

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requirements has been approved by the NRC in the past for the Haddam Neck Plant.⁽³⁾

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.

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 respectfully request issuance by February 5, 1993, which is when the currently required 24-month testing interval would be exceeded, with the amendment effective upon issuance.

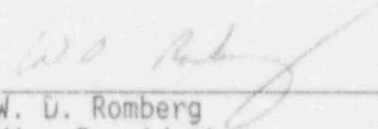
We trust you will find this information satisfactory, and remain available to discuss this with you at your convenience.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY:


W. D. Romberg
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, CT 06116

(3) U.S. Nuclear Regulatory Commission letter to E. J. Mroczka, "Issuance of Amendment (TAC No. 80936)," dated August 28, 1991.

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Subscribed and sworn to before me

this 18th day of November, 1992

Deborah A. Farley
Notary Public

Date Commission Expires: 12/31/95