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The Northeast Utilities System

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U. S. Nuclear Regulatory Commission
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Millstone Nuclear Power Station Unit 3
Integrated Leakage Rate Tests

An independent assessment of the Millstone Unit 3 containment system which was conducted as a part of the Configuration Management Plan (CMP) has been completed. As a result, this letter is being submitted to provide corrections to Millstone Station Unit 3 Integrated Leakage Rate Test (ILRT) results which were submitted to the Nuclear Regulatory Commission via letters dated October 24, 1985; October 5, 1989; and January 13, 1994.

The valve lineup for each ILRT was reviewed by the CMP to determine which penetrations were not vented and drained and may not have had appropriate penalties applied. The CMP has determined that a number of penetrations were not properly accounted for. The appropriate penalties have been determined and applied to correct the test results for 1985, 1989, and 1993.

In addition to the above, a discrepancy was found during the CMP pertaining to the lack of local leakage rate testing results for the Fuel Transfer Tube expansion bellows, thus changing the boundary for the ILRT. The result was that the non-safety class Fuel Transfer Tube expansion bellows local leak rate test tap was inappropriately maintained closed for prior ILRTs, but should have been open. Correction of the ILRT test results for the difference in the containment boundary caused by the Fuel Transfer Tube test tap is included.

Corrected test results are all within the ILRT acceptance criteria.

Attachment 1 provides corrected ILRT results for 1985, 1989, and 1993.

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Commitments

Attachment 2 provides the regulatory commitments in this submittal.

Should you have any questions concerning this submittal, please contact Mr. David A. Smith at (860) 437-5840.

Very Truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



M. H. Brothers

Vice President - Millstone Unit No. 3

cc: H. J. Miller, Region I Administrator
W. D. Travers, PhD, Director, Special Projects Office
J. W. Andersen, NRC Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

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Attachment 1

Millstone Nuclear Power Station, Unit No. 3
Revised Integrated Leakage Rate Test Results

June 1997

Attachment
Revised Integrated Leakage Rate Test Results

Correction of the 1985 Preoperational ILRT Test Results

	<u>Prior Reported As-Left ILRT Results</u>	<u>Local Leakage Correction</u>	<u>Corrected As-Left ILRT Results</u>
Mass Point UCL*	0.0692	0.0025	0.0717
Total Time UCL*	0.106	0.0025	0.1085

As the acceptance criteria for this test was 0.675 percent / 24 hours ($0.75L_a$), the correction of the ILRT test results for the isolated penetrations has no impact on the acceptability of the 1985 preoperational ILRT.

Correction of the 1989 Periodic ILRT Test Results

	<u>Prior Reported ILRT Results</u>	<u>Local Leakage Correction</u>	<u>Corrected ILRT Results</u>
As-Found UCL*	0.2937	0.0010	0.2947
As-Left UCL*	0.2919	0.0017	0.2936

As the acceptance criteria for this test was 0.9 percent / 24 hours (L_a) for the as-found case and 0.675 percent / 24 hours ($0.75L_a$) for the as-left case, the correction of the ILRT test results for the isolated penetrations has no impact on the acceptability of the 1989 periodic ILRT.

Correction of the 1993 Periodic ILRT Test Results

	<u>Prior Reported ILRT Results</u>	<u>Local Leakage Correction</u>	<u>Corrected ILRT Results</u>
As-Found UCL*	0.1327	0.0012	0.1339
As-Left UCL*	0.1313	0.0020	0.1333

As the acceptance criteria for this test was 0.65 percent / 24 hours (L_a) for the as-found case and 0.4875 percent / 24 hours ($0.75L_a$) for the as-left case, the correction of the ILRT test results for the isolated penetrations has no impact on the acceptability of the 1993 periodic ILRT.**

* percent / 24 hours

**The containment design leakage rate, L_a , was changed between the 1989 and 1993 tests.

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Attachment 2

Millstone Nuclear Power Station, Unit No. 3
NNECO's Commitments
Revised Integrated Leakage Rate Test Results

June 1997

Attachment 2
List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Please notify the Manager - Nuclear Licensing at the Millstone Nuclear Power Station Unit No. 3 of any questions regarding this document or any associated regulatory commitments.

Number	Commitment	Due
None		