

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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February 5, 1988

Docket No. 50-423
B12792

Re: 10CFR50.90

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Reactor Coolant System Leakage Detection Systems

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.

Discussion

Currently the Millstone Unit No. 3 Technical Specifications are based on the assumption that there are three independent leakage detection systems. In reality, the containment atmosphere gaseous monitor and the containment atmosphere particulate monitor are a common system sharing a common sample point, sample lines, isolation valves, sample fan, radiation monitor skid and power supply. The only independence is that there are two detectors with associated electronics; one looking at a particulate filter and the other at a gas chamber. Should one of the common components in the system fail, both systems will fail, thereby placing the unit in an action statement requiring shutdown in six hours. Plant shutdown is unnecessary in this case, since adequate capability still exists to detect primary system leakage. The containment sump monitoring capabilities are still available and containment atmosphere airborne levels will be determined using grab samples.

The changes to Technical Specification Section 3.4.6.1 clarify that primary system leakage at Millstone Unit No. 3 is monitored by two techniques and not three. The requirements of Regulatory Guide 1.45 are satisfied by employing separate detection methods for monitoring airborne radioactivity and sump level as discussed in FSAR Section 5.2.5 and SER Section 5.2.5. Airborne radioactivity is monitored using the particulate and/or gaseous monitor

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and the liquid volumes are monitored using the sump level and/or pumped capacity system. Loss of one technique is acceptable for thirty days provided the other technique is available. These changes to the Technical Specifications allow greater flexibility with both the particulate and the gaseous radioactivity monitors inoperable. The thirty day action statement allows adequate time to repair or replace the inoperable components. The proposed action statement for the inoperable airborne monitors also requires more frequent grab sampling (once every 12 hours as opposed to once every 24 hours) and further clarifies the analysis requirements. The proposed changes require that analysis for the sample be performed within the subsequent 2 hours, which is more restrictive than the current Technical Specifications. The proposed action statement for inoperable containment drain sump level and pumped capacity monitoring systems, although worded differently, remains the same as the current specification. Both allow up to 30 days of continued operation in the Action Statement.

Based on the above discussion, NNECO has determined that there is no change in the radioactivity detection capability of the RCS leakage detection system due to the proposed changes.

Significant Hazards Consideration

NNECO has reviewed the proposed changes in accordance with 10CFR50.92 and has concluded that they do not involve a significant hazards consideration in that these changes would not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously analyzed. The revised operability requirements will not provide a significant degradation in the Reactor Coolant System leakage detection capability. These changes do not adversely affect the consequences of the design basis accidents. Therefore, it is concluded that previously analyzed accidents are not affected.
2. Create the possibility of a new or different kind of accident from any previously analyzed. 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 a margin of safety. The proposed requirements do not have any adverse impact on the containment integrity. Since the proposed changes do not affect the consequences of any accident previously analyzed, there is no reduction in the margin to safety.

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Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, FR7751) of amendments that are considered not likely to involve a significant hazards consideration. The proposed changes are enveloped by example (ii), a change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications, e.g., a more stringent surveillance requirement. Although the 30 day action statement is a less restrictive requirement for RCS leakage monitoring, more stringent surveillance requirements have been established. The proposed changes require that grab samples of the containment atmosphere be obtained at least once per 12 hours and analyzed within the next 2 hours. This requirement is more restrictive than the current technical specification which requires that grab samples of the containment atmosphere be obtained and analyzed at least once per 24 hours.

Based upon the information contained in this submittal and the environmental assessment for Millstone Unit No. 3, there are no significant radiological or nonradiological impacts associated with the proposed action, and the proposed license amendment will not have a significant effect on the quality of the human environment.

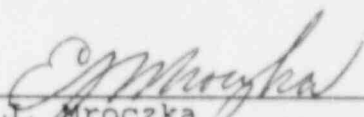
The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved the attached proposed revisions and has concurred with the above determinations.

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

Pursuant to the requirements of 10CFR170.12(c), enclosed with this amendment request is the application fee of \$150.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



E. J. Mroczka
Senior Vice President

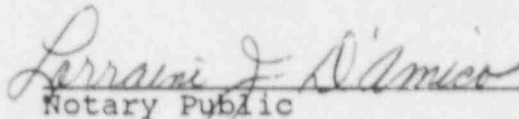
cc: Kevin McCarthy, Director
Radiation Control Unit
Department of Environmental Protection
Hartford, Connecticut 06116

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W. T. Russell, Region I Administrator
R. L. Ferguson, 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 E. J. Mroczka, who being duly sworn, did state that he is Senior 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 Licensees 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, 1988