

**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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September 2, 1988

Docket No. 50-423  
B12985

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  
Containment Isolation Valves

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

Discussion

The proposed changes to the Millstone Unit No. 3 Technical Specifications consist of deleting Table 3.6-2 which lists containment isolation valves and replacing it with a reference to the Millstone Unit No. 3 FSAR Table 6.2-65 in the Technical Specifications bases (3/4.6.3). The FSAR Table 6.2-65 contains a complete listing of all containment penetration valves and far more information than contained in the existing Technical Specifications. Thus, to include this information in the Technical Specifications is redundant.

The proposed changes to Technical Specification Section 3/4.6.1 and 3/4.6.3 delete references to Table 3.6-2 as it will no longer be a part of the Technical Specifications. In addition, a note on opening of certain manual valves during the plant operations under administrative control has been taken from Table 3.6-2 and adequately included in the Technical Specifications (Definition 1.7, Containment Integrity and Section 4.6.1.1.a). The addition or deletion of any containment isolation valve shall be made in accordance with 10CFR50.59 and approved by the Plant Operation Review Committee.

Deletion of the tabular listing from the Technical Specifications contributes to the ongoing efforts to upgrade the Millstone Unit No. 3 Technical Specifications into a more usable and less cumbersome document without compromising the ability to control changes made to the contents of the table. Moreover, deletion of the table is consistent with the recommendations of NUREG-1024 as a short-term improvement item and the efforts by the Westinghouse Owners Group (WOG) and NUMARC Technical Specification upgrade initiatives to make the Technical Specifications a more clear and concise document.

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The proposed changes do not delete the requirement for containment isolation valve operability from the Technical Specifications. The action statements and surveillance requirements will remain in the Technical Specifications. Therefore, the proposed changes do not reduce the effectiveness of the Technical Specification requirements. The proposed changes can in no way adversely affect nuclear safety.

#### Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the proposed changes and concluded that they do not involve a significant hazards consideration. The basis of the 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 analyzed. The removal of Table 3.6-2 from the Technical Specifications and replacing it with a reference to the Millstone Unit No. 3 FSAR Table 6.2-65 in the Technical Specification bases does not reduce the effectiveness of the Technical Specifications. Also, there are no changes proposed to the Limiting Conditions for Operation (LCO) or to surveillance requirements. Therefore, there is no impact on the design basis accidents.
2. Create the possibility of a new or different kind of accident from 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. The proposed changes have no effect on plant operation.
3. Involve a significant reduction in a margin of safety. Since the proposed changes do not affect the consequences of any accident previously analyzed, there is no reduction in the margin of safety.

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. 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 stated earlier, the proposed changes are being made to coincide with the efforts by the WOG and NUMARC activities to upgrade the Technical Specifications to a more clear and concise document. The Millstone Unit No. 3 FSAR Table 6.2-65 contains a complete listing of all containment penetration valves and far more information than contained in the existing Technical Specifications. The proposed changes do not reduce the effectiveness of Technical Specification requirements as they do not delete the requirement for containment isolation valve operability from the Technical Specifications. In addition, the action statements and surveillance requirements will remain in the Technical

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Specifications. The addition or deletion of any containment isolation valve shall be made in accordance with 10CFR50.59 and approved by the Plant Operation Review Committee.

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.

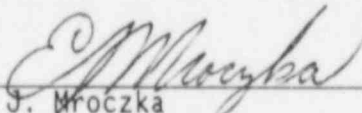
The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved the proposed change and has concurred with the above determinations.

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

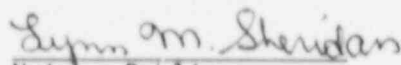
  
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E. J. Mroczka  
Senior Vice President

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

W. T. Russell, Region I Administrator  
D. H. Jaffe, NRC Project Manager, Millstone Unit Nos. 2 and 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 Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

  
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Lynn M. Sheridan  
Notary Public