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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May 19, 1988

Docket No. 50-423
B12896
Re: 10CFR50.90

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

References: (1) J. F. Opeka letter to B. J. Youngblood, "Millstone Nuclear Power Station, Unit No. 3, Technical Specifications," dated August 21, 1985.

(2) S. E. Scace letter to U.S. Nuclear Regulatory Commission, Licensee Event Report 87-035-00, dated November 16, 1987.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Containment Systems Surveillance Requirements

Pursuant to 10CFR50.90, Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its operating license, NPF-49, by incorporating the change identified in Attachment 1 into the Technical Specifications of Millstone Unit No. 3.

Background

On October 16, 1987 while performing a biannual procedure review, NNECO identified a discrepancy between the containment air lock testing method specified in Technical Specification Section 4.6.1.3 and the method utilized by the surveillance procedure. The surveillance procedure, which had been written using preliminary Technical Specifications, allowed the use of the constant pressure make up method for assessing containment air lock integrity, whereas Technical Specifications require the use of a pressure decay test.

Upon discovering the discrepancy, Millstone Unit No. 3 entered the Limiting Condition for Operation in accordance with Technical Specifications (for 2 doors inoperable) and performed an air lock leakage surveillance which verified that the overall air leakage was within limits. The test was satisfactory.

NNECO has determined that the surveillance method utilized is an equivalent method of leakage detection and achieves the objective of the basis of the required surveillance which states that "surveillance testing of the air lock seals provides assurance that the overall air lock leakage will not become excessive due to seal damage during intervals between air lock leakage tests" (see Reference (2)).

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Discussion

The proposed change to the Millstone Unit No. 3 Technical Specification Section 4.6.1.3 incorporates additional methods of surveillance for assessing containment leak tightness. The containment air lock is currently leak tested by pressure decay, in accordance with 10CFR50, Appendix J. The leakage criteria for the air lock is .05 La. The proposed change will allow use of a flow measurement to verify seal integrity which is allowed by 10CFR50, Appendix J, and will permit direct comparison to the air lock leak limit of .05 La. The surveillance limit of .01 La is well below the overall air lock leak criteria of .05 La and is, therefore, acceptable. Performance of an overall air lock test per 3.6.1.3.b also guarantees integrity of the air lock. The radiological dose calculations performed for inside containment events are not affected since the allowed leakage rate is not exceeded.

By incorporating the proposed change into the plant Technical Specifications, NNECO is allowed more flexibility in the testing of air lock door seals. Additional methods of surveillance were previously endorsed by NNECO (Reference (1)) in response to questions from the Staff concerning the draft Technical Specifications for Millstone Unit No. 3. Moreover, the addition of the alternate flow rate method of surveillance for assessing air lock seal leakage is consistent with the Westinghouse Standard Technical Specifications, Revision 5.

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.92 and has concluded that it does not involve a significant hazards consideration in that the change would not:

1. Involve a significant increase in the probability or consequences of an accident previously analyzed. The proposed change adds two methods of surveillance for the containment air lock. Both methods provide assurance that containment leakage is within the limits assumed in the radiological consequences of the design basis events. 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 revised surveillance requirements do not have any adverse impact on the containment integrity. Since the proposed change also does not affect the consequences of any accident previously analyzed, there is no reduction in a 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 change herein 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. As stated earlier, the addition of the alternate flow rate method of containment leak tightness has been determined to be an equivalent measure of leakage detection. In addition, the use of the alternate flow rate method of surveillance is consistent with the Westinghouse Standard Technical Specifications, Revision 5.

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 $150.00.

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, CT 06116

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 Licensee herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Lorraine J. D'Amico
Notary Public

My Commission Expires March 31, 1993

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Attachment 1

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Containment Systems Surveillance Requirements

May 1988