

November 21, 2000

Mr. S. E. Scace - Director
Nuclear Oversight and Regulatory Affairs
c/o Mr. David A. Smith
Northeast Nuclear Energy Company
P. O. Box 128
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3 - REQUEST FOR
ADDITIONAL INFORMATION ON EMERGENCY DIESEL GENERATOR
SURVEILLANCE REQUIREMENTS AMENDMENT REQUEST (TAC NO.
MA9661)

Dear Mr. Scace:

By letter dated July 31, 2000, Northeast Nuclear Energy Company requested an amendment to Facility Operating License No. NPF-49 for Millstone Nuclear Power Station, Unit No. 3. The amendment proposed changes to allow certain emergency diesel generator (EDG) surveillance requirements to be performed when the plant is operating instead of shut down as currently required. Additional changes would remove EDG accelerated testing and special reporting requirements, and the surveillance requirement to perform EDG inspections.

Enclosed is a request for additional information (RAI) regarding your amendment request. The enclosed RAI was discussed with Mr. Paul Russell, et al., of your staff during a teleconference on October 5, 2000. As mutually agreed to during the teleconference, we requested that you provide this information within 30 days from the date of this letter. If circumstances result in the need to revise this target, please call me at (301) 415-1484 at the earliest opportunity.

Sincerely,

/RAI/

Victor Nerses, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosure: RAI

cc w/encl: See next page

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Unit 3

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Millstone Nuclear Power Station
Unit 3

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Request for Additional Information
Millstone Nuclear Power Station, Unit No. 3

By letter dated July 31, 2000, Northeast Nuclear Energy Company (NNECO/licensee) requested the Nuclear Regulatory Commission (NRC) to review and approve changes to the Technical Specifications (TS) 3.8.1.1, "Electrical Power Systems - A.C. Sources - Operating," and 3.8.1.2, "Electrical Power Systems - A.C. Sources - Shutdown," for the Millstone Nuclear Power Station, Unit No. 3. These proposed changes would allow certain EDG surveillance requirements to be performed when the plant is operating instead of shut down as currently required. Additional changes will remove EDG accelerated testing and special reporting requirements, and the surveillance requirement to perform EDG inspections. We have reviewed these proposed changes against the criteria in Regulatory Guide (RG) 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," RG 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear power Plants," and RG 1.137, "Fuel-Oil Systems for Standby Diesel Generators," for demonstrating the operability of EDGs and will require the following information to complete our review.

1. RG 1.108 recommends that the 24-hour test be performed during shutdowns. Provide the basis for performing surveillance requirements (SRs) 4.8.1.1.2.g.7, 11, and 13 during power operation. How are SRs 4.8.1.1.2.g.11 and 13 currently performed and how long does it take to conduct these test? Demonstrate that performing these SRs during power operation would have no adverse affect on the availability of the EDGs.
2. What are the effects of a loss of offsite power (LOOP), without a LOCA, during the 24-hour test with EDG paralleled with offsite power. The staff needs this information to determine that the EDG in test will remain available in the event of a LOOP.
3. As a precaution, the EDG 24-hour test should not be performed during forecasted severe weather or unstable electrical grid conditions. The staff recommends that a statement be included in applicable procedures to consider severe weather or unstable electrical grid conditions before performing the 24-hour test.
4. As a precaution to assure EDG availability during the 24-hour test, the staff recommends that a footnote be added to SR 4.8.1.1.2.g.7 to perform the EDG 24-hour test only when the other required EDG is operable and, should the other required EDG become inoperable during the 24-hour test, the test should be aborted.
5. The proposed change will remove SR 4.8.1.1.2.g.1, which addresses diesel inspections. Your letter indicates that the SR is contained in plant maintenance procedures that are subject to 10 CFR 50.59. Provide additional information that explains how changes in EDG inspections will be subject to evaluations under 10 CFR 50.59.

Enclosure