



**Northeast
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The Northeast Utilities System

NOV 20 2000

Docket No. 50-423
B18271

Re: 10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

**Millstone Nuclear Power Station, Unit No. 3
Response to Request for Additional Information
Installation of a New Sump Pump System in
the Engineered Safety Features Building (PLAR 3-00-2)**

The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) with responses to three questions received from the NRC staff regarding a proposed license amendment request. The proposed license amendment request deals with changes in the Millstone Unit No. 3 Final Safety Analysis Report (FSAR) due to the installation of a new sump system in the Engineered Safety Features Building (ESFB).

By a letter dated June 30, 2000,⁽¹⁾ (initial submittal) Northeast Nuclear Energy Company (NNECO) informed the NRC that the installation of a new sump pump system in the ESFB, involves an unreviewed safety question (USQ) and proposed a license amendment request that changes the Millstone Unit No. 3 FSAR. Additionally, by a letter dated September 22, 2000,⁽²⁾ NNECO provided the NRC with a revised answer to question 2 in the Significant Hazards Consideration.

⁽¹⁾ Raymond P. Necci letter to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, License Amendment Request - Unreviewed Safety Question, Proposed Revision to Final Safety Analysis Report, Installation of a New Sump Pump System in the Engineered Safety Features Building (PLAR 3-00-2)," dated June 30, 2000.

⁽²⁾ Raymond P. Necci letter to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, License Amendment Request - Unreviewed Safety Question, Proposed Revision to Final Safety Analysis Report, Installation of a New Sump Pump System in the Engineered Safety Features Building (PLAR 3-00-2), Revised Answer to Question 2 in the Significant Hazards Consideration," dated September 22, 2000.

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Based on the preliminary review of the initial submittal, the NRC Staff requested responses to two questions by a letter dated October 26, 2000.⁽³⁾ Additionally, in a teleconference on November 7, 2000, the NRC staff requested the addition of a third question to the list. Attachment 1 contains responses to all three questions.

There are no regulatory commitments contained in this letter.

If you should have any questions on the above, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Raymond P. Necci
Vice President - Nuclear Technical Services

Subscribed and sworn to before me

this 20th day of November, 2000


Notary Public

Date Commission Expires: _____

**SANDRA J. ANTON
NOTARY PUBLIC
COMMISSION EXPIRES
MAY 31, 2005**

Attachment (1)

cc: H. J. Miller, Region I Administrator
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

⁽³⁾ V. Nerses letter to S. E. Scace, "Millstone Nuclear Power Station, Unit No. 3 - Request For Additional Information on Installation of New Sump Pump System in the Engineered Safety Features Amendment Request (TAC No. MA9365)," dated October 26, 2000.

Attachment 1

Millstone Nuclear Power Station, Unit No. 3

Response to Request for Additional Information
Installation of a New Sump Pump System in
the Engineered Safety Features Building (PLAR 3-00-2)

Specific Responses to Three Questions

Responses to NRC Staff's Questions

Question 1:

Will the maintenance and surveillance requirements for the new sump pump be governed by the Maintenance Rule as required by 10 CFR 50.65?

Response to Question 1:

Pump (3SRW-P5) will not be governed by the Maintenance Rule as required by 10 CFR 50.65. The bases for this conclusion are as follows:

The scope of the Maintenance Rule is governed by 10 CFR 50.65(b)(1), (b)(2)(i), (b)(2)(ii), and (b)(2)(iii). Each criterion is evaluated for the new non safety related sump pump (3SRW-P5) in the Engineered Safety Features Building (ESFB).

- 10 CFR 50.65(b)(1) applies to safety related Structures, Systems, and Components (SSC).

Pump 3SRW-P5 is not safety related as determined by the Material And Equipment Parts List (MEPL) evaluation MP3-CD-2921. Therefore, pump 3SRW-P5 does not meet this scoping criterion.

- 10 CFR 50.65(b)(2)(i) applies to non safety related SSCs, that are relied upon to mitigate accidents or transients or are used in plant emergency operating procedures (EOPs).

This pump will be used to remove ground water which accumulates in sump 3SRW*SUMP6. This is not considered an accident mitigating function. The pump provides no function associated with a plant transient. Additionally, this pump will not be relied upon in any EOPs in accordance with the new design. Therefore, the pump does not meet this scoping criterion.

- 10 CFR 50.65(b)(2)(ii) applies to non safety related SSCs, whose failure could prevent a safety-related SSCs from fulfilling their safety-related function.

The new sump 3SWR*SUMP6 provides isolation between the Recirculation Spray System (RSS) cubicle and the ground water and has a four day capacity. The pump is accessible from the ESFB roof which will allow replacement should a failure occur. A failure of the sump pump is not postulated to result in a subsequent failure of the RSS pumps, therefore it does not meet this scoping criterion.

- 10 CFR 50.65(b)(2)(iii) applies to non safety related SSCs, whose failure could cause a reactor scram or actuation of a safety-related system.

This pump cannot fail such that it can cause a reactor scram or actuation of a safety-related system. Therefore this pump does not meet this scoping criterion.

Question 2:

The new casing pipe, casing expansion joint, casing roof penetration, sump inlet piping, sump enclosure, and associated gaskets and seals comprising the new Supplemental Leak Collection and Release System (SLCRS) are credited with the safety function of preventing release of excessive radiation outside the Engineered Safety Features Building (ESFB). These components are not classified as ASME Class 1, 2, or 3 components and, as such, are not subject to ASME Section XI inservice inspection pursuant to 10 CFR 50.55a. However, the performance or condition of these components must be periodically monitored pursuant to 10 CFR 50.65. Describe any periodic tests, inspections, or other measures proposed to assure the long-term pressure and sealing integrity of these components.

Response to Question 2:

The new casing pipe, casing expansion joint, casing roof penetration, sump inlet piping, and sump become a new SLCRS boundary, which supports the current SLCRS system to perform its function of preventing release of excessive radiation.

The SLCRS draw-down test, SP 3614I.3, "Supplementary Leak Collection and Release System Negative Pressure Verification," is performed on a refueling frequency (Technical Specification Surveillance Requirements 4.6.6.2.2). This test verifies that the "as is" condition of the Secondary Containment Boundary is adequate to support SLCRS operation.

Visual Inspections in accordance with EN 31091, "Visual Inspection of Secondary Containment Boundary Structural Integrity," are performed in conjunction with SP 31118, "Visual Inspection of Accessible Exterior Concrete Containment Surfaces," during shutdowns for type A testing. This visual inspection is performed to satisfy the requirements of Technical Specification 4.6.6.3 Surveillance Requirements. SP 31091 identifies the boundaries to be walked down and visually inspected. The subject piping and enclosure will be specifically identified in this procedure to ensure that it is inspected.

Visual examination of building structures is conducted on a three year periodic basis in accordance with EN 31098, "MP3 Condition Monitoring of Structures." The visual examination three year periodic basis may be extended to five years, if justified, based upon prior inspection findings. Sleeves, bellows and the penetration would be looked at as part of the visual examination. The building roofs are examined on a yearly basis per the same procedure.

Question 3:

Confirm that the new sump pump motor load has been added to the Emergency Diesel Generator (EDG) load ?

Response to Question 3:

In accordance with the Millstone Unit No. 3 Final Safety Analysis Report (FSAR), the worst case EDG loading is 5102kW which is within the EDG 2000hr rating of 5335kW. The new 0.5hp sump pump will be powered by Motor Control Center (MCC) 32-4T. This load is reflected in the EDG total load as a portion of the MCC load. When the demand and diversity factors are applied to this motor, it represents a 0.1hp (.0746kw) or 0.0014% of the EDG rating. This load is enveloped in the rounding up to the nearest whole kw number for the MCC load.