

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

April 1, 1993

Docket No. 50-423  
B14356

Re: 10CFR50.90

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3  
Proposed Revision to Technical Specifications-A.C. Sources

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

Description of the Proposed Changes

The proposed changes would revise the placement of a footnote to Technical Specification 4.8.1.1.2(a) and 4.8.1.1.2(b) whereby a footnote would be relocated from these two sub-parts to the main heading; Specification 4.8.1.1.2. As currently written, the footnote only can apply to Technical Specification 4.8.1.1.2(a) and 4.8.1.1.2(b). This limited application results in the inability to use the prelube system prior to performing many of the surveillance requirements. The proposed changes would result in the prelube system being operable for all surveillance tests required by Technical Specification 4.8.1.1.2. Attachment 1 provides marked-up pages of the proposed changes to the Millstone Unit No. 3 Technical Specifications and Attachment 2 provides the retyped pages of the Millstone Unit No. 3 Technical Specifications.

Safety Assessment

Performance of the surveillance requirement helps to ensure the availability of the Emergency Diesel Generator to mitigate a loss of offsite power. As the technical specification is currently written, the use of the prelube system during the performance of these surveillance requirements may invalidate certain surveillance tests, and result in the declaration that the diesel generator is out of service. NNECO and Colt Industries, the diesel manufacturer, have discussed this matter and agreed that the operability of the diesels is not contingent upon prelubing.

9304050177 930401  
PDR ADOCK 05000423  
P PDR

ADD 1

Prelubing is performed to decrease wear and tear and will ultimately extend the life of the diesel engine. Therefore, the extension of the note which states that "testing shall be conducted in accordance with the manufacturer's recommendations regarding engine prelube and warmup procedures, and as applicable regarding loading requirements" to all portions of surveillance requirement 4.8.1.1.2 is consistent with the manufacturers recommendations and will not affect the operability or ability of the diesels to start, but will in fact result in the extension of the diesel life.

#### Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the attached proposed changes and has concluded that they do not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised.

The proposed changes do not involve a significant hazards consideration based on the following:

1. The relocation of the footnote to encompass all aspects of diesel surveillance requirements will not increase the probability or consequences of an accident previously evaluated.

Each diesel's primary function is to provide power to mitigate the consequences of an accident when offsite power is lost. Therefore, the probability of an accident is not affected. Prelubing is performed to decrease engine wear which will extend diesel life. Ultimately, prelubing reduces the number of maintenance intervals, thereby increasing the availability of the diesels.

2. The proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

There are no new failure modes associated with the proposed change. Since the plant will continue to operate as designed, the proposed changes will not modify the plant response and is not considered a new accident.

3. The proposed changes do not involve a significant reduction in the margin of safety.

The proposed changes do not have any adverse impact on the margin of safety afforded the diesel generators. This change will prevent engine wear and ultimately extend the life of the diesels. The operability of the diesels is not dependent upon the prelube system and therefore, the margin of safety is not affected.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986,

U.S. Nuclear Regulatory Commission  
B14356/Page 3  
April 1, 1993

51FR7751) 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 do not constitute a significant hazards consideration. This change will assist in extending the life of the diesels and will adjust the surveillance requirements such that they will support the diesel manufacturer's maintenance recommendations.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed change meets the criteria detailed in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

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

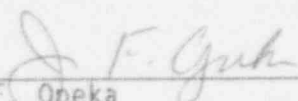
Regarding our proposed schedule for this amendment, we request issuance at your earliest convenience with the amendment effective within 30 days of issuance.

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

Should you have any questions, please contact my staff.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
\_\_\_\_\_  
J. F. Opeka  
Executive Vice President

Attachment  
cc: see page 4

U.S. Nuclear Regulatory Commission  
B14356/Page 4  
April 1, 1993

cc: T. T. Martin, Region I Administrator  
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3  
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,  
and 3

Subscribed and sworn to before me

this 1st day of April, 1993

Lorraine J. D'Amico  
Notary Public

Date Commission Expires: 3/31/98