

NORTHEAST UTILITIES



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

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April 27, 1993

Docket No. 50-423
B14446

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
One-Time Extension to Containment Leakage Surveillance Requirement

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

Description of the Proposed Change

As a result of an unusually long maintenance outage (service water system work and erosion/corrosion work) during 1991 and two limited outages in 1992, NNECO has rescheduled the start of the Millstone Unit No. 3 refueling outage from November 1992 to July 31, 1993. Subsequent unanticipated events may further change the actual start date.

The due date for completion of various surveillance requirements, including a 25 percent allowance per Specification 4.0.2, will occur prior to the 1993 refueling outage. Successful completion of these surveillance requirements is necessary to satisfy technical specification requirements and avoid a plant shutdown.

In a letter dated February 26, 1993,⁽¹⁾ NNECO informed the Staff that after a thorough review of the 18-month technical specification surveillances, four groups of surveillances have been identified which would require an extension from the existing technical specification requirements in order to avoid an unnecessary plant shutdown prior to the start of the fourth refueling outage.

(1) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "18-Month Technical Specification Surveillance (TAC No. M85470)," dated February 26, 1993.

ADD 1

By letter dated March 30, 1993,⁽²⁾ NNECO submitted the first in a series of extension requests for various 18-month surveillances that will expire prior to the start of the fourth refueling outage. In subsequent letters dated April 13, 1993,⁽³⁾ and April 15, 1993,⁽⁴⁾ NNECO submitted the second and third in a series of one-time extension requests to the 18-month surveillance interval. This submittal represents the fourth and final extension request required to support the 1993 refueling outage.

The change proposed herein will allow a one-time extension to the containment leakage integrated leak rate test (ILRT), otherwise known as Type A test. The containment ILRT is required to be conducted at approximately 40 ± 10 -month intervals during shutdown at a pressure not less than the accident pressure, 53.27 psia (38.57 psig), during each 10-year service period. The last Millstone Unit No. 3 ILRT was completed on July 7, 1989. Therefore, the next ILRT is due on or about September 7, 1993 (40 months \pm 10 months). However, due to the unusually long maintenance outage during 1991 and two limited duration outages in 1992, NNECO has rescheduled the start of the fourth refueling outage for Millstone Unit No. 3 from November 1992 to July 31, 1993. The 1993 refueling outage is currently scheduled for approximately 70 days. Generally speaking, the ILRT is conducted just prior to start up from the outage. Therefore, it is anticipated that the surveillance interval for the ILRT will be exceeded prior to the time which NNECO can conduct the ILRT. The proposed change to Technical Specification Section 4.6.1.2.a will allow a one-time extension to the specified surveillance interval of 40 ± 10 months for the Type A test until the end of the fourth refueling outage currently scheduled to begin July 31, 1993. The following footnote is proposed to be added to Technical Specification 4.6.1.2.a:

"The test interval for conducting a Type A test shall be extended to allow the second Type A test, within the first ten-year service period, to be conducted during the Cycle 4 refueling outage. This extension expires upon completion of the Cycle 4 refueling outage."

The proposed change does not alter or change any acceptance criteria of the surveillance requirement. The change proposed herein (one-time extension to the containment ILRT) is similar to that approved by the NRC on the Millstone Unit No. 2 Docket (Docket no. 50-336, Amendment No. 156, dated April 8, 1992).

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- (2) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "One-Time Extension to Various 18-Month Surveillance Requirements," dated March 30, 1993.
- (3) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "One-Time Extension to Various 18-Month Surveillance Requirements," dated April 13, 1993.
- (4) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Steam Generator Surveillance Requirements," dated April 15, 1993.

Attachment 1 provides marked-up pages of the proposed change to the Millstone Unit No. 3 Technical Specifications. Enclosed as Attachment 2 are the retyped pages of the Technical Specifications.

Safety Assessment

10CFR50, Appendix J, Section III.D.1(a) states that a set of three Type A tests shall be performed "...at approximately equal intervals during each 10-year service period." Millstone Unit No. 3 Technical Specification Section 4.6.1.2.a specifies that three Type A overall ILRTs be conducted at 40 ± 10 -month intervals during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant in-service inspection.

On July 7, 1989, Millstone Unit No. 3 successfully conducted a Type A test, which was the first Type A test in the first 10-year service period, and passed both the "As Found" and "As Left" ILRTs. The "As Found" leakage result was 0.2937 weight percent per day and the "As Left" leakage result was 0.2919 weight percent per day. These values represent 45.2 percent and 44.9 percent of the Technical Specification limit of 0.65 weight percent per day (L_a), respectively, which demonstrates the overall leak tightness of the containment system. The second Type A test for this first 10-year service period is due on or about September 7, 1993. However, because of the extended maintenance outage in 1991 for service water repairs and erosion/corrosion work and two short mid-cycle outages in 1992, NNECO has rescheduled its fourth refueling outage from November 1992 to July 31, 1993. Therefore, the second Type A test for this first 10-year service period will be performed during the 1993 refueling outage.

Type B and C tests have been conducted during the 1991 refueling outage and the two short mid-cycle outages in 1992 and are scheduled to be performed during the upcoming 1993 refueling outage. The 1991 and 1992 Type B and C leakage results were well below the limits specified in the Technical Specifications. Demonstrated operability of these components and penetrations provides assurance that containment integrity has been maintained.

10CFR50, Appendix J, Section III.D.1(b) states "the performance of Type A tests shall be limited to periods when the plant facility is nonoperational and secured in the shutdown condition...in accordance with safety procedures defined in the license." During the 1993 Millstone Unit No. 3 refueling outage, the plant will be in a safe shutdown condition for refueling. Therefore, there are no significant safety concerns regarding the containment or its protective boundaries for maintaining leakage integrity since the plant will already be in a shutdown condition. The proposed change will allow the Type A test to be performed while the plant is in a safe shutdown condition, as permitted by 10CFR50, Appendix J.

The proposed change does not change or impact the design basis accident (DBA) loss of coolant accident (LOCA) or the containment's leakage behavior in response to the accident since they are not a function of surveillance test intervals. Since the plant will be in a safe shutdown condition, the possibility of a DBA LOCA does not exist. The period of time between September 7 and the scheduled ILRT at the end of the outage (late September/early October) is also not a safety concern since the plant will be in cold shutdown during this time period.

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.92 and has concluded that the change does not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed change does not involve an SHC because the change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

On July 7, 1989, Millstone Unit No. 3 successfully conducted a Type A test and passed both the "As Found" and "As Left" ILRTs. The "As Found" and "As Left" leakage results represent 45.2 percent and 44.9 percent of the technical specification limit of 0.65 weight percent per day (L_a), respectively, which demonstrates the overall leak tightness of the containment system. No operations are known to have occurred which would suggest any substantive degradation of these results. There are no DBAs adversely affected due to this change.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

Containment isolation features limit the consequences of an accident. The proposed extension to the test schedule will have no impact on these features. Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created. The proposed change meets the requirements of 10CFR50, Appendix J, Section III.D.1(a) since the surveillance interval extension will allow three Type A tests to be completed at approximately equal intervals within the 10-year period.

3. Involve a significant reduction in the margin of safety.

The proposed change does not impact or reduce the margin of safety of the containment or other protective boundaries, nor does it challenge the safety limits or their boundaries. Since the proposed change does not affect the consequences of any accident previously evaluated, there is no reduction in the margin of safety.

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Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51 FR 7751) of amendments that are considered not likely to involve an SHC. Although the proposed change is not enveloped by a specific example, the change would not involve a significant increase in the probability or consequences of an accident previously evaluated, and therefore, the proposed change does not involve an SHC. The proposed change allows a one-time extension to the specified surveillance interval for the containment ILRT to be conducted during the Cycle 4 refueling outage. Based on the successful completion of the last Millstone Unit No. 3 Type A test in July 1989 and the relatively low Type B and C leakage results from the 1991 and 1992 outages, there is reasonable assurance that containment integrity is maintained. In addition, since the plant will be in a safe shutdown condition for refueling, there is no possibility for a DBA LOCA to occur. Therefore, no significant safety concerns exist for the containment or its protective boundaries for maintaining a leakage limiting boundary.

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not increase the type and amounts of effluents that may be released off site, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed change meets the criteria delineated in 10CFR51.22(c)(9) for categorical exclusion from the requirements for an environmental impact statement.

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


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

The proposed change will allow a one-time extension to the containment ILRT 40 ± 10 -month interval. Since the plant will already be in a shutdown condition, the safety significance of the extension request will be minimized. The last Millstone Unit No. 3 ILRT was completed on July 7, 1989, therefore the next ILRT is due on or about September 7, 1993. As such, NNECO respectfully requests the NRC Staff to process and issue this proposed amendment prior to September 7, 1993, with the amendment effective upon the date of issuance.

Should the Staff require any additional information, please contact my staff.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: See Page 6

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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

Mr. Kevin McCarthy, Director
Radiation Control Unit
Department of Environmental Protection
Hartford, CT 06116

Subscribed and sworn to before me

this 27th day of April, 1993

Lorraine J. D'Amico

Date Commission Expires: 3/31/98