

NORTHEAST UTILITIES

THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
NORTH EAST 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

September 24, 1993

Docket No. 50-423
B14477

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
Removal of Component Lists from Technical Specifications

Introduction

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

Description of the Proposed Change

The proposed changes to the Millstone Unit No. 3 Technical Specifications are based upon Generic Letter (GL) 91-08,⁽¹⁾ which provides guidance on removing component lists from technical specifications. This guidance provides an acceptable alternative to identify components by plant identification numbers as it is currently listed in the tables of technical specification components. Removing component lists is acceptable because it does not alter existing technical specification requirements or those components to which they apply. These changes will implement GL 91-08 by removing Table 3.6-1, "Enclosure Building Bypass Leakage Paths." Table 3.6-1 will subsequently be located in Operating Procedure (OP)-3273, "Technical Requirements Supplementary Technical Specifications," consistent with the guidance provided in GL 91-08.

NNECO notes that current Millstone Unit No. 3 Technical Specifications, in part, include some of the specific improvements of GL 91-08 in regard to

(1) J. G. Partlow to All Holders of Operating Licenses or Construction Permits for Nuclear Power Plants, "Removal of Component Lists from Technical Specifications," (Generic Letter 91-08), dated May 6, 1991.

ADD 1

removing additional tables from technical specifications. Amendment 28,⁽²⁾ to the Technical Specifications removed lists of Containment Penetration Conductor Overcurrent Protective Devices and Motor-Operated Valve Thermal Overload Protection for relocation into the Millstone Unit No. 3 Final Safety Analysis Report (FSAR). These proposed changes will revise respective Bases Sections to allow these lists to be incorporated into OP-3273.

The proposed changes will allow Table 3.6-1 and the lists of tables revised by Amendment 28 to be incorporated into OP-3273. OP-3273 is subject to the control provisions for plant procedures as identified by the Administrative Controls section of the Technical Specifications. Any changes to OP-3273 are reviewed per the requirements of 10CFR50.59, which will provide an adequate means to control changes to the tables once incorporated into OP-3273.

The proposed changes also make various editorial corrections. These proposed changes are designed to improve overall clarity and quality within the Technical Specifications.

The specific changes, as well as a description of the changes, are as follows:

- Table of Contents, pages ii, v, viii, ix, xii, xiii, xiv, xv, xviii, contain typographical errors. These proposed changes will add consistency between the text and the Table of Contents.
- Technical Specification Table 3.3-1, (page 3/4 3-7): Delete the statement for Action 9. Action 9 is not used in Table 3.3-1.
- Technical Specification Table 3.3-3, (page 3/4 3-24): Delete notation and corresponding text for "***" and "****". These symbols are no longer used in the table.
- Technical Specification Table 3.3-4, (page 3/4 3-29): Correct a typographical error to show the proper units of micro curies per cubic centimeter.
- Technical Specification 4.4.5.3: Delete statement to initial inservice inspection. The requirement of the statement has been met; therefore, removal of the statement is appropriate and safe.
- Technical Specification 3.6.1.2: As allowed by GL 91-08, the reference to and listing of "Enclosure Building Bypass Leakage Paths" shall be removed, and this listing of bypass leakage paths will now be included in OP-3273.

(2) D. H. Jaffe letter to E. J. Mroczka, "Issuance of Amendment 28 to the Millstone Unit No. 3 Technical Specifications," dated December 19, 1988.

- Page 3/4 6-36a: The proposed change will remove this blank page. Removal of this blank page will have no affect on page sequencing.
- Technical Specification 3/4.4.9 Bases: Reprint page to correct an editorial error.
- Technical Specification 3/4.6.1.2 Bases: Add a statement to indicate that the enclosure building bypass leakage paths are listed in OP-3273.
- Technical Specification 3/4.8.4 Bases: Revise the reference to where the listing of Containment Penetration Conductor Overcurrent Protective Devices and Thermal Overload Protection Bypassed Only Under Accident Conditions and Thermal Overload Protection Not Bypassed Under Accident Conditions can be found from the FSAR to OP-3273.
- Technical Specification 3/4.11.4: Revise section number from 3/4.11.4 to 3/4.11.3 to be consistent with the text portion of the Technical Specifications.

Safety Assessment

The proposed changes to the Technical Specifications are consistent with the guidance of GL 91-08. This guidance provides an acceptable alternative to identifying every component by its plant identification number as it is currently listed in the tables of technical specification components. The proposed changes will implement the guidance of GL 91-08 and remove Table 3.6-1 from the Technical Specifications and locate the table into OP-3273.

In addition, the proposed changes revise reference to the Bases Sections for the location of the lists of Containment Penetration Conductor Overcurrent Protective Devices and Motor-Operated Valve Thermal Overload Protection. Specifically the changes replace references to the FSAR with OP-3273. The ability to update these lists is improved by their incorporation into OP-3273. OP-3273 is afforded the option of being revised on a more frequent basis (i.e., whenever revisions are required) than FSAR revisions which are performed on an annual basis. Therefore, the changes improve the ability of these lists to more accurately reflect plant information.

As indicated above, Table 3.6-1 will be removed from the Technical Specifications. Table 3.6-1 and those lists removed by Amendment 28 will be added to OP-3273. A change to these lists in OP-3273 will require a 10CFR50.59 evaluation to be performed. The 10CFR50.59 evaluation involves a review of the three criteria in 10CFR50.59(a)(2) to determine if the proposed changes involve an unreviewed safety question. Also, a Plant Operations Review Committee (PORC) review and approval of a proposed change will be required. The process outlined above will ensure a thorough review is performed on proposed changes to items relocated from the Technical Specifications to OP-3273.

The balance of the proposed changes also make various editorial corrections to the Millstone Unit No. 3 Technical Specifications. These changes are designed to improve overall clarity and quality within the Millstone Unit No. 3 Technical Specifications. The nature of these changes is such that no adverse effects on safety can result.

Significant Hazards Consideration

NNECO has reviewed the proposed changes in accordance with 10CFR50.92 and concluded that the changes do 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 changes do not involve an SHC because the changes would not:

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

The proposed changes to allow Table 3.6-1 to be removed from the Technical Specifications and added to OP-3273 will not affect existing technical specification requirements or those components to which they apply. Operability and surveillance requirements are still retained in the Technical Specifications. The revisions to the Bases Section for tables removed by Amendment 28 allow these lists to be added to OP-3273. Revisions to these lists will be evaluated in accordance with 10CFR50.59 and are also reviewed and approved by the PORC. The balance of the proposed changes also make various editorial corrections to the Millstone Unit No. 3 Technical Specifications. These changes are designed to improve overall clarity and quality within the Millstone Unit No. 3 Technical Specifications. The nature of these changes is such that no adverse effects on safety can result. Therefore, the proposed changes will not increase the probability or consequences of an accident previously evaluated.

2. 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 changes. Since the plant will continue to operate as designed, the proposed changes will not modify the plant response to the point where a new accident can be considered.

3. Involve a significant reduction in margin of safety.

The proposed changes do not have any adverse impact on the protective boundaries, nor do they affect the consequences of any accident previously analyzed. The proposed changes to remove Table 3.6-1 from the Technical Specifications will not affect existing technical specification requirements or those components to which they apply. Operability and surveillance requirements are retained in the Technical Specifications.

The revision to the Bases Sections for the lists removed by Amendment 28 allow incorporation into OP-3273. This will allow for the ability to revise these lists more frequently than currently afforded by the FSAR. Revisions to these lists will be reviewed in accordance with 10CFR50.59. Additionally, a PORC review of the proposed changes is also performed. Therefore, the proposed changes will not impact the margin of safety as defined in any Technical Specification.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (51FR7751, March 6, 1986) of amendments that are considered not likely to involve an SHC. Although the proposed changes are not enveloped by a specific example, the proposed changes would not involve a significant increase in the probability or consequences of an accident previously analyzed. As previously stated, the removal of Table 3.6-1 from the Technical Specifications does not alter existing technical specification requirements of those components to which they apply. The changes to clarify the Bases Sections offer improved ability to update those lists removed from Technical Specifications by Amendment 28. Although Table 3.6-1 will be deleted from the Technical Specifications, and included in OP-3273, operability and surveillance requirements are retained in the Technical Specifications. Therefore, sufficient control will remain in the Technical Specifications to ensure operability and surveillance requirements are maintained. In addition, upon removal from the Technical Specifications, Table 3.6-1 and the lists removed by Amendment 28 will be maintained in OP-3273. Any changes to the lists will be made in accordance with the provisions of 10CFR50.59 and reviewed by the PORC.

The retype of the proposed changes to the Technical Specifications are contained in Attachment 2 and reflects the currently issued version of the Technical Specifications. Attachment 1 presents the marked-up version of the Technical Specifications. Technical Specification changes submitted in the letters dated July 31, 1992,⁽³⁾ and February 10, 1992,⁽⁴⁾ are not reflected in the enclosed retype. NNECO suggests that the NRC Staff check with NNECO for continuity with technical specifications prior to issuance.

NNECO has reviewed the proposed licensed 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

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- (3) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Fire Protection, Technical Specifications and License Conditions," dated July 31, 1992.
- (4) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Proposed Revision to the Technical Specifications, Response Time for the Reactor Trip System and ESFAS," dated February 10, 1992.

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meets the criteria delineated in 10CFR51.22(c)(9) for categorical exclusion from the requirements for an environmental impact statement.

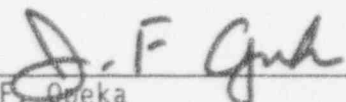
The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved this proposed amendment and concurs with the above determination.

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

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY




J. F. Opeka
Executive Vice President

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 T.A. McCarthy, Director
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
P.O. Box 5066
Hartford, CT 06102-5066

Subscribed and sworn to before me

this 24th day of Sept., 1993



Date Commission Expires: 3/31/95