



Northeast
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

July 22, 1994

Docket No. 50-423
B14803

Re: 10CFR50.90

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

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Technical Specifications
Shutdown Margin, Reactor Trip System, and
Heat Flux Hot Channel Factor

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

Description of the Proposed Changes

The proposed license amendment addresses three separate changes. The changes are administrative in nature. All issues have been reviewed and judged as technically acceptable. The following is a description of the proposed changes.

- The title of Technical Specification Figure 3.1-5, "Required Shutdown Margin for Mode 5 with RCS Loops Drained," refers to "loops drained," but the referencing Section (3.1.1.2) is applicable with "loops not filled." The title of Figure 3.1-5 is proposed to be changed to be consistent with the applicability of the limiting condition for operation (LCO). The index page is also proposed to be changed to reflect the appropriate title of Figure 3.1-5.
- Relocation of Chemical and Volume Control System (CVCS) Position Requirements — The proposed change relocates the CVCS valve requirements from the Reactor Coolant System — Cold Shutdown specification to the Reactivity Control Systems — Shutdown Margin specification. The CVCS valve requirements are for the prevention of a boron dilution events and are, therefore, more appropriately located in the reactivity control section. The proposed modification will revise the Technical Specification entitled "Reactivity Control Systems - Shutdown Margin — Cold Shutdown — Loops Not Filled," by modifying LCO 3.1.1.2, by adding a new action statement 'b' and by revising Surveillance

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Requirement 4.1.1.2.2 (i.e., relocating the surveillance requirements of 4.4.1.4.2.3 and adding valve 3CHS-V305 to Surveillance Requirement 4.1.1.2.2). The proposed modification will also revise the Technical Specification entitled "Reactor Coolant System - Cold Shutdown - Loops Not Filled," by modifying LCO 3.4.1.4.2, by deleting Action Statement 'c,' and by deleting Surveillance Requirement 4.4.1.4.2.3. Specification 3/4.9.1.1 entitled "Refueling Operations - Boron Concentration" is modified to reference the section which now contains the requirements. The bases corresponding to these two specifications are also proposed to be modified.

Heat Flux Hot Channel Factor - $F_Q(Z)$ — The proposed modification will revise Technical Specification 3.2.2.1 "Power Distribution Limits, Heat Flux Hot Channel Factor — $F_Q(Z)$, Four Loops Operating," by revising the Action Statement. In addition, Surveillance Requirements 4.2.2.1.2.f and 4.2.2.1.4.f will be deleted and Surveillance Requirements 4.2.2.1.2.g and 4.2.2.1.4.g will be revised to reflect the deletion of the two previous surveillances. One administrative change is being proposed for Surveillance Requirement 4.2.2.1.3.a. The statement should read "...AFD within the target band limit about [emphasis added] the target flux difference..." This phrasing is consistent with the terminology in Sections 4.2.2.2.3.a, 3.2.1.1.b, and 3.2.1.2.b.

Technical Specification 3.2.2.2, "Power Distribution Limits, Heat Flux Hot Channel Factor $F_Q(Z)$, Three Loops Operating," is proposed to be changed to revise the Action Statement and delete Surveillance Requirements 4.2.2.2.2.f and 4.2.2.2.4.f. Surveillance Requirements 4.2.2.2.2.g and 4.2.2.2.4.g are proposed to be revised to reflect the deletion of the two previous surveillances.

These changes have been developed because the specifications, as currently written, have actions included within the surveillance requirements. These actions can conflict with the actions designated by the LCOs. For example, the action for Specification 3.2.2.1 requires that power be reduced if the limits are not met. The corresponding surveillance requirement (4.2.2.1.2.f) allows the additional option to reduce the axial flux difference (AFD) without a power reduction. The purpose of the proposed change is to have all the applicable actions included with the action statements in the LCO.

In addition, Technical Specifications 4.2.2.1.5 and 4.2.2.2.5 require that a three percent manufacturing

tolerance and a five percent measurement uncertainty be included in all $F_0(Z)$ measurements that are not made in support of the relaxed axial offset control (RAOC) measurements (Technical Specification Sections 4.2.2.1.2 and 4.2.2.2.2). This is a carryover from the generic Westinghouse RAOC specifications⁽¹⁾ which assume that the base load option is not retained. However, since Millstone Unit No. 3 has kept the base load option available, it is appropriate to retain reference to the base load surveillances in this specification. Therefore, reference to Section 4.2.2.1.4 is included in Section 4.2.2.1.5, and reference to Section 4.2.2.2.4 is included in Section 4.2.2.2.5.

Safety Assessment

The proposed changes are administrative in nature in that they are clarifications to or relocation of existing technical specifications and do not affect plant operations. These changes are: (1) change to the title of Figure 3.1-5 from "loops drained" to "loops not filled," (2) relocation of the CVCS position requirements from the reactor coolant system section to the reactivity control systems section, and (3) revision of the heat flux hot channel factor technical specification to remove actions from the surveillance requirements section. These three changes are administrative in nature and do not impact the accident analysis in the Final Safety Analysis Report.

Significant Hazards Consideration

In accordance with 10CFR50.92, NNECO has reviewed the proposed changes 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 would not involve an SHC because the changes would not:

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

The proposed changes are clarifications or relocation of existing technical specification requirements and do not substantively affect plant operation. Since they do not

(1) WCAP-10216-PA, "Relocation of Constant Axial Offset Control F_0 Surveillance Technical Specification," dated June 1983.

affect plant operations, they cannot be initiators of any events.

The safety analysis of the plant is unaffected by the proposed changes. Since the safety analysis is unaffected, the calculated radiological releases associated with the accident analyses are not affected. Therefore, the proposed changes will not increase the probability or consequences of previously evaluated accidents.

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

As previously stated, the proposed changes are clarifications or relocation of existing technical specifications and do not substantively affect plant operation. No new failure modes are introduced. Since the proposed modifications do not affect plant operations, they cannot be initiators of new events.

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

The proposed changes are clarifications or relocation of existing technical specifications and are not substantive changes. The correction of the title in Figure 3.1-5 will ensure consistency throughout the technical specifications. The relocation of the CVCS valves requirements from the RCS — Cold Shutdown Specification to the Reactivity Control Systems — Shutdown Margin specification will ensure the CVCS valves requirements are located in the most appropriate location and will help the operators from the commission of errors or omission of actions due to inappropriately located material. The final change will revise the action statement sections of the specification pertaining to heat flux hot channel factor to ensure all actions in these specifications are clearly displayed and not contained in the corresponding surveillance requirements. Therefore, since these changes are editorial in nature, the proposed modification will have no impact on the margin of safety.

Moreover, the Commission has provided guidance concerning the application of standards set forth in 10CFR50.92 by providing certain examples (March 6, 1986, 51FR7751) of amendments that are considered not likely to involve an SHC. The proposed modifications are administrative and editorial in nature and are most like example (i) a purely administrative change to technical specifications: for example, a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. The proposed changes would not involve a significant increase in the probability or consequences

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of an accident previously analyzed. As previously stated, the proposed changes involve clarifications to or relocations of existing technical specifications and do not substantively affect plant operations.

Environmental Consideration

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not increase the types 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 changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

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

Schedule

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

Conclusions

As discussed above, the proposed changes have been determined not to involve a significant hazards consideration pursuant to 10CFR50.92. Additionally, NNECO has determined that the proposed license amendment request meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

Attachment 1 provides a mark-up of the proposed changes, whereas Attachment 2 provides the re-typed pages of the Millstone Unit No. 3 technical specifications. The re-type of the proposed changes to the technical specifications in Attachment 2 reflect the currently issued version of the technical specifications. NNECO hereby suggests that the NRC staff check with NNECO for continuity with the technical specifications prior to issuance.

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

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Should the Staff require any additional information to process this request, please contact Mr. R. G. Joshi at (203) 665-3844.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY:

E. A. DeBarba
E. A. DeBarba
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 22 day of July, 1994

Robert J. Dietrich

Date Commission Expires: 3/31/95

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Attachment 1

Millstone Nuclear Power Station, Unit No. 3

Proposed Revision to Technical Specifications
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Marked Up Pages

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