

Northeast
Utilities System

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Northeast Utilities Service Company
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May 1, 1995

Doc'et No. 10-423
E15193

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
24-Month Fuel Cycle - Containment Type B and Type C Testing
and Steam Generator Tube Inspections and Request for
Exemption from 10CFR50, Appendix J

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 Millstone Unit No. 3 Technical Specifications. In addition, NNECO is requesting, on behalf of Millstone Unit No. 3, a schedular exemption from the requirements of III.D.2 and III.D.3 of Appendix J to 10CFR50. This schedular exemption would permit Millstone Unit No. 3 to perform Type B and Type C tests and bypass leakage tests beyond 24 months, but not to exceed 30 months between each test. The exemption would be valid for one cycle only.

Discussion

The amendment request included in this letter represents a defined group of submittals necessary to support the 24-month fuel cycle surveillance extensions for Millstone Unit No. 3. We expect to submit license amendment requests at regular intervals, with the last request to be submitted by July 1995.

This submittal is considered a cost beneficial licensing action by NNECO. Implementation of a 24-month fuel cycle would save in excess of the \$100,000 guideline identified by the NRC Staff with no reduction in public health and safety.

This submittal modifies the frequency of several surveillance requirements of the Millstone Unit No. 3 Technical Specifications. These surveillance requirements pertain to:

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- Steam Generator Tube Inspections
- 10CFR50, Appendix J, Type B and Type C tests

In support of this license amendment request, the following information is provided:

- Attachment 1 and Attachment 2 forward the marked-up and retyped technical specification pages, and reflects the currently issued version of the technical specifications.
- Attachment 3 describes the proposed technical specification changes.
- Attachment 4 provides a safety assessment for the changes. NNECO has reviewed the proposed technical specification changes in accordance with 10CFR50.92 and has determined that the changes do not involve a significant hazards consideration (SHC). The basis for this determination is discussed in Attachment 4.
- Attachment 5 provides the justification for a scheduler exemption from the requirements of Sections III.D.2 and III.D.3 of Appendix J to 10CFR50. The scheduler exemption would permit Millstone Unit No. 3 to perform Type B and Type C tests and bypass leakage tests beyond 24 months, but not to exceed 30 months between each test. Generic Letter (GL) 91-04 indicates that the NRC Staff is developing changes to Appendix J to 10CFR50 to accommodate a 24-month fuel cycle and to resolve other problems with the regulation. The requested exemption is, therefore, expected to be temporary, in that it would provide an acceptable basis for a testing interval beyond 24 months until the regulations are revised or other acceptable bases are established.

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. The proposed changes described in Attachment 3 are not enveloped by a specific example. However, it has been demonstrated (i.e., Attachment 4) that the proposed changes do not involve an SHC. Therefore, the proposed changes do not negatively impact the public health or safety.

Environmental Consideration

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve an SHC, do not significantly 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 requirement of an environmental impact statement.

Nuclear Safety Assessment Board Review

The Nuclear Safety Assessment Board has reviewed this proposed amendment request and concurs with the above determination.

State Notification

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

Schedule Required for NRC Approval

As stated earlier, the remaining amendment requests will be submitted at regular intervals, with the last request to be submitted by July 1995. Currently, Cycle 6 operation (i.e., the start of the 24-month fuel cycle) is scheduled to begin in June 1995. It is our objective to obtain NRC approval of all the amendment requests related to the 24-month fuel cycle by September 1996. NNECO requests that the license amendment be effective upon issuance with implementation within 90 days.

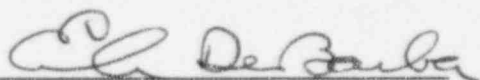
If the NRC Staff should have any questions or comments regarding this submittal, please contact Mr. R. G. Joshi at (203) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY:


E. A. DeBarba
Vice President

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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 T.A. McCarthy, Director
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Subscribed and sworn to before me

this 1st day of May, 1995

Shirley J. Storman

Date Commission Expires: Aug 31, 1998