

NORTHEAST UTILITIES



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

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October 22, 1992

Docket No. 50-423
B14254

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
Emergency Diesel Generator 18-Month Surveillance Requirements

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 Change

The proposed change to the Millstone Unit No. 3 Technical Specification Section 4.2.1.1.2.g.1 will extend the surveillance requirement frequency for the Millstone Unit No. 3 Emergency Diesel Generators (EDGs) by allowing a one-time extension to the current 18-month surveillance plus the additional 25% allowed by Specification 4.0.2. Specifically, the proposed change will delete the existing footnote (*) and corresponding specification 4.0.6, and replace it with a new footnote to surveillance requirement 4.8.1.1.2.g.1. This change will allow the EDGs to be inspected in accordance with the procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service. The inspection is currently scheduled to be performed no later than December 25, 1992. The proposed change will defer the inspection until the 1993 (fourth) refueling outage, but not beyond September 30, 1993.

Need for the Amendment Request

Within some of the surveillance requirements for systems and components for Millstone Unit No. 3, a frequency of 18 months is specified. Many of the surveillances clearly state, "18 months at shutdown," which we believe was intended to indicate that the tests/surveillances were to be done during the refueling outage. The surveillance requirements contained in the existing technical specifications are designed to assure that the quality of equipment and components is maintained so that facility operation will be within the safety limits, and limiting conditions for operation of the system will be met. NNECO has determined the total time of the EDG inoperability during this inspection would be in excess of the current 72-hour technical specification limit.

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The total time of each diesel generator inoperability for this type of inspection will be approximately 15 days. Therefore, in order to avoid the possibility of not meeting the operability requirements for a Limiting Condition for Operation, it is desirable to perform this inspection in an extended outage and therefore a one-time extension of the 18-month EDG surveillance will be necessary.

This one-time-only extension to surveillance requirement 4.8.1.1.2.g.1 is needed because performance of the EDG surveillance inspection within the current interval would require an unscheduled shutdown of the plant. The previous EDG inspection of Train "A" was completed on March 4, 1991. Train "B" was last inspected on February 8, 1991. As a result of an unusually long maintenance outage (service water system work and erosion/corrosion work) during 1991, NNECO has rescheduled the Millstone Unit No. 3 refueling outage from November 1992 to approximately September 1993. Increasing the interval between refueling outages will cause Millstone Unit No. 3 to exceed the 18-month surveillance, plus the additional 25% allowance allowed by Specification 4.0.2. It is noted that the proposed change does not alter or change any of the other surveillances required per Technical Specification 4.8.1.1.2.g.

In addition, considering the time duration and work scope during the last outage in October 1992, NNECO determined that this inspection should be performed during the next refueling outage scheduled to begin on or about September 1993.

Safety Assessment

The proposed change to Technical Specification Section 4.8.1.1.2.g.1 will extend the surveillance inspection frequency for the EDGs by extending the current 18-month surveillance, plus 25% (4.5 months) allowed by Technical Specification Section 4.0.2. The proposed one-time extension is approximately nine months beyond that allowed by the technical specifications. Based on the analysis of the EDG past performance and surveillance test data, it is determined that the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Analysis of the surveillance test data for the period of time since the last surveillance inspection to the present time for both EDGs indicates that both diesels performed well (i.e., no failures in the last 100 valid tests). In the time period between December 1991 and September 1992, the start time trend data for the EDG Train "A" indicates 16 subsequent starts with start times remaining well below the 11 second time limit (maximum time recorded was approximately 8.5 seconds) with no visible trend toward increasing start times. The same data for the EDG Train "B" indicates 26 subsequent starts with start times remaining below the 11 second time limit (maximum time recorded approximately 9.7 seconds). There was no visible trend toward increasing start times. The total operating time for both engines is considered low and therefore significant wear of the parts has not been experienced and is not expected.

Additional information about the engine condition is available from lube oil analyses performed monthly. Samples are taken at two locations--the rocker arm area and the engine sump. Lube oil is tested for water content which is an indication of an internal engine leak. Various metal particle content is an indication of excessive parts wear or a bearing problem (tin and/or lead content increase). This lube oil analysis proves to be a very good indication of engine problems. Review of the lube oil analysis results for the time period since June 1991 to present do not indicate any abnormal readings except high water content in the January 1992 diesel Train "A" rocker arm oil sample. The presence of water was later attributed to a leak in an injector cooling line. The problem was corrected by replacing the injection nozzles.

During this one-time extension of nine months for the engine surveillance test, the engine is not expected to log any significant number of operating hours which could affect engine performance. Since the last surveillance inspection, the diesel engines logged the following number of hours: EDG Train "A" - 108 hours. EDG Train "B" - 103 hours, which is considered low. The EDG manufacturer accepted a six-month extension in the surveillance inspection time interval in 1987 stating that an additional 60 to 100 hours of diesel operation should pose no problem.

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.92 and concluded that the change does 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 change does not involve a significant hazards consideration because the change would not:

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

The proposed amendment would extend the surveillance requirement interval of 18 months plus 25% allowed by Specification 4.0.2. The proposed one-time extension is approximately nine months beyond that allowed by the technical specifications. The objectives of the surveillance inspections are to detect possible engine problems before they become serious and to verify the operability of the diesels. The surveillance test (start test) data can provide indirect indication of the engine deterioration if the start times are increasing. The proposed extension will not impact the EDG's ability to start and perform its intended function. Analysis of the surveillance test data for the period of time since the last surveillance inspection to the present time for both the EDGs indicate that both the EDGs performed well (refer to Safety Assessment discussion). During the one-time extension of nine months for the engine surveillance test, the engines are not expected to log any significant number of operating hours which could affect the engine performance. An EDG failure will have the

same effect on the consequences of the previously evaluated accidents regardless of the cause of failure. Therefore, the proposed extension will not increase the probability of occurrence or the consequences of an accident previously evaluated.

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

The EDG failure is already analyzed and there are no new failure modes associated with the proposed change. The proposed change, an extension of the surveillance inspection by nine months beyond the time allocated by the technical specification, will not create a potential for a different accident than previously evaluated. In addition, the EDG failure to start on time is the ultimate failure mode and which has already been considered in the existing accident analysis. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously analyzed.

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

The proposed change does not involve a change in the safety limits, setpoints or design margins. In addition, the available surveillance data for the EDGs indicate that there was no visible trend toward increasing start times which would indicate engine deterioration or internal parts wear. Also, engine lube oil analyses do not indicate the presence of water (indication of an internal water leak) or metal particles which indicate increased internal parts (bearings) wear. During the one-time extension of nine months for the engine surveillance test, the engine is not expected to log any significant number of operating hours which could affect the engine performance. Therefore, the proposed change will not involve a significant reduction in a margin of safety.

Moreover, the Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 5, 1986, 51FR7751) of amendments that are considered not likely to involve a significant hazards consideration. 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 analyzed. Analysis of the surveillance data for the period of time since the last surveillance inspection to the present time for both EDGs, indicate that both diesels performed well. The start test data provide indirect indication of the engine deterioration if the start times increase. The data for the EDGs indicates that there was no visible trend toward increasing start times. In addition, the EDGs, which are only used for standby service, log very few hours of operation on a yearly basis. Therefore, engine wear is minimal and the extensions should not have any adverse impact on EDG operation when called upon for its intended function. The proposed change does

not change any of the other surveillances required per Technical Specification 4.8.1.1.2.g. For the EDG, there is no change to equipment, setpoints or operation for which operability has been sufficiently demonstrated on a monthly frequency as required by the technical specifications, and, therefore, the proposed change would not involve a significant increase in the probability or consequences of an accident previously analyzed.

NNECO has reviewed the proposed license amendment against the criteria in 10CFR51.22 for environmental considerations. The proposed change does 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 delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

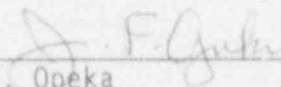
The Millstone Unit No. 3 Nuclear Review Board has reviewed and approved the proposed change and has concurred with the above determination.

The proposed amendment will allow the 18-month (plus 25%) surveillance requirement for the EDG to be performed during the fourth refueling outage presently scheduled to begin in September 1993. Current EDG surveillance requirements in Technical Specification 4.8.1.1.2.g.1 (due no later than December 25, 1992), for the EDG Train "B" would force the unit to shut down for this purpose. Therefore, NNECO hereby requests the NRC Staff to process and issue this proposed amendment prior to December 25, 1992, to be effective upon issuance. We acknowledge and apologize for the short time available to process this request on a nonemergency basis. We will, of course, promptly provide any additional information the Staff may need to respond to this request.

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

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

U.S. Nuclear Regulatory Commission
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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 22 day of October, 1992

Lorraine J. D'Amico
Notary Public

Date Commission Expires: March 31, 1993