

Mr. B. D. Kenyon  
President - Nuclear Group  
Northeast Utilities Service Company  
c/o Mr. Terry L. Harpster  
Director - Nuclear Licensing Services  
P.O. Box 128  
Waterford, CT 06385

December 9, 1996

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING A STANDBY GAS TREATMENT  
SYSTEM LICENSE AMENDMENT REQUEST FOR MILLSTONE UNIT 1 (TAC NO.  
M94258)

Dear Mr. Kenyon:

By letter dated December 7, 1995, Northeast Nuclear Energy Company (NNECO) submitted a license amendment request regarding changes to the Millstone Unit 1 Technical Specifications for the standby gas treatment system. The NRC staff has completed a preliminary review of NNECO's request and has identified two issues that require additional information. Please respond to the attached request for additional information within 60 days from receipt of this letter.

Sincerely,  
Original signed by:  
Stephen Dembek, Project Manager  
Special Projects Office - Licensing  
Office of Nuclear Reactor Regulation

Docket No 50-245

Enclosure: As stated

cc w/encl: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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A handwritten signature in cursive script, reading "Stephen Dembek", is written above the typed name.

Stephen Dembek, Project Manager  
Special Projects Office - Licensing  
Office of Nuclear Reactor Regulation

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Enclosure: As stated

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

MILLSTONE UNIT 1

STANDBY GAS TREATMENT SYSTEM

TAC NO. M94258

By letter dated December 7, 1995, Northeast Nuclear Energy Company (NNECO) submitted a license amendment request regarding changes to the Millstone Unit 1 Technical Specifications for the standby gas treatment (SBGT) system. The NRC staff has completed a preliminary review of NNECO's request and has identified the following two issues that require additional information.

1. In the discussion of purging or venting through the SBGT system on page 6 of the December 7, 1995, letter, NNECO states:

When this issue [license amendment request] was first discussed, the staff requested a specification which would limit the use of SBGT for purging and venting to less than 90 hours per year. The intent of the original proposed change was to achieve a similar limitation on usage without being bound to a specific number of hours. Having the option to purge or vent to the stack should significantly decrease the time when SBGT is exposed, since exhausting directly to the exhaust plenum will be the normal path.

Limiting Condition for Operation (LCO) action statement times are determined, in part, on the safety significance of the system and on the amount of time one train is expected to be unavailable due to testing, maintenance, or failures of one or more components. Since the LCO for the SBGT system will now be entered when the SBGT system is used for venting, the time spent in the SBGT system action statement has the potential to increase significantly. Therefore, the staff needs further clarification on the estimated time SBGT will be used for venting and NNECO's plans for controlling the amount of time the SBGT system is used for venting. This information is needed so that the staff can be assured that the additional time to be spent in the action statement is not inconsistent with the assumption that entry into the action statement will be infrequent and will primarily be to address out of service equipment or to conduct required testing.

2. In the submittal dated December 7, 1995, NNECO included a change to Bases Section 3.7.B which would state:

When standby gas is used in this manner (and primary containment is required), the automatic initiation of the train not in use will be disabled, and an operator will be assigned responsibility to ensure, in the event of a DBA [design basis accident], that the train is started after the atmosphere control containment isolation valves close. This manual action is necessary to ensure that the second train is not exposed to the pressure created from a LOCA [loss-of-coolant accident] inside containment.

Enclosure

In the discussion of substituting manual actions for automatic actions, NNECO did not address whether they reviewed the regulations, general design criteria, the Millstone Unit 1 Updated Final Safety Analysis Report, or other licensing documents that would prohibit the manual actions. Further, although NNECO did address the issue of the possible increase in overall radiation release, NNECO (1) did not adequately justify why the 1- and 3-minute scenarios for operator action are bounding, and (2) did not address other considerations such as a potential radiation exposure to the operator, or other potentially relevant considerations such as those summarized in Section 6.7 of the Inspection Manual section entitled, "Operable/Operability: Ensuring the Functional Capability of a System or Component," which was issued as part of Generic Letter 91-18.