



Northeast
Utilities System

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Docket No. 50-245

B16381

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

Millstone Nuclear Power Station, Unit No. 1
Revised Regulatory Guide 1.97
Electrical Equipment Qualification Deviation Requests

The purpose of this letter is to revise the scope of equipment included in the deviation request from the design and qualification criteria recommended in Regulatory Guide (RG) 1.97. Northeast Nuclear Energy Company (NNECO) has determined that the original submittal⁽¹⁾ for containment isolation valve position indications (variable B-10) included valves in the Shutdown Cooling (SDC) system which are not credited as containment isolation valves in a closed loop system.

The original deviation request for variable B-10 included the SDC system valves 1-SD-1, 1-SD-2A, 1-SD-2B, 1-SD-4A, 1-SD-4B, and 1-SD-5. These valves, which are both inside and outside of the containment penetrations, provide a containment isolation function during various accidents analyzed for Millstone Unit No. 1. The valves credited for isolation during a Design Basis Accident for a closed loop system under RG 1.97 are limited to the valves outside of the primary containment penetrations. The SDC isolation valves outside of containment for penetration X12 are 1-SD-2A and 1-SD-2B, and for containment penetration X45 valve 1-SD-5. These valves are normally closed, and are required to remain closed following a containment isolation signal. Additionally, a system interlock closes these valves and prevents them from opening when recirculation loop suction temperature exceeds the setpoint. During operation of the unit at the reactor temperatures and pressures assumed for a Design Basis Accident, the valves would already be closed with interlocks in place to block

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⁽¹⁾ J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 1 Regulatory Guide 1.97, Revision 2 Electrical Equipment Qualification Deviation Requests," dated October 5, 1995



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operation. As a result, there is reasonable assurance that the valves would remain closed.

The associated valve position indication lights on CRP-903 are in a mild environment, and are not required to be environmentally qualified per 10CFR50.49. Operation of the associated system is not relied upon to mitigate the consequences of an accident for which environmental qualification is required, and therefore these valves will not be required to reposition following a containment isolation. Additionally, existing motor operated valve limit switch position indications would likely remain reliable for at least the short term following an event.

Failure of the containment isolation position indications under postulated accident environmental conditions would not prevent the satisfactory accomplishment of the containment isolation function of the valves. Therefore, qualification of the position indications is not necessary.

NNECO requests the removal of valves 1-SD-1, 1-SD-4A, and 1-SD-4B from the original deviation request submittal from the design and qualification criteria of RG 1.97 for containment isolation valve position indications (variable B-10). There are no other changes in scope of equipment for variables B-10, D-21, and D-22 contained in the original request.

There are no commitments contained within this letter. Please contact R. Walpole at (860) 440-2191 if you have any further questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

P. D. Hinnenkamp
Director, Unit Operations for

A handwritten signature in dark ink, appearing to read 'John P. McElwain', is written over a horizontal line.

John P. McElwain
Millstone Unit No. 1 Recovery Officer

U.S. Nuclear Regulatory Commission
B16381\Page 3

cc: H. J. Miller, Region I Administrator
S. Dembek, NRC Project Manager, Millstone Unit No. 1
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1
Dr. W. D. Travers, Director, Special Projects