

MARKUP OF PROPOSED REVISION

Refer to the attached markup of the proposed revision to the Technical Specifications. The attached markup reflects the currently issued version of the Technical Specifications listed below. Pending Technical Specification revisions or Technical Specification revisions issued subsequent to this submittal are not reflected in the enclosed markup.

The following Technical Specifications changes are included in the attached markup:

- Revises the Action Statement to clarify that action is required "With water level at greater than 13 feet above Mean Sea Level, USGS datum . . .":

3/4.7.6.

- Revises the Action Statement by adding the requirement to close the pump cubicle sump drain valves:

3/4.7.6.

- Revises the associated bases by clarifying that 14.5 MSL is the floor elevation of the Service Water pump cubicle rather than the level at which external flood waters could enter the service water pump cubicle:

3/4.7.6 Bases

- Revises the associated bases by adding the requirement to close the pump cubical sump drain valves:

3/4.7.6 Bases

PLANT SYSTEMS

3-12-47

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3/4.7.6 FLOOD PROTECTION

LIMITING CONDITION FOR OPERATION

3.7.6 Flood protection shall be provided for the service water pump cubicles and components when the water level exceeds 13 feet Mean Sea Level, USGS datum, at the Unit 3 intake structure.

APPLICABILITY: At all times.

ACTION:

greater than

With the water level at 13 feet above Mean Sea Level, USGS datum, at the Unit 3 intake structure, shut the watertight doors of both service water pump cubicles within 15 minutes.

and close the pump cubicle sump drain valves

SURVEILLANCE REQUIREMENTS

4.7.6 The water level at the Unit 3 intake structure shall be determined to be within the limits by:

- a. Measurement at least once per 24 hours when the water level is below elevation 8 feet above Mean Sea Level, USGS datum, and
- b. Measurement at least once per 2 hours when the water level is equal to or above elevation 8 feet above Mean Sea Level, USGS datum.

PLANT SYSTEMS

BASES

SURVEILLANCE REQUIREMENTS

For the surveillance requirements, the UHS temperature is measured at the locations described in the LCO write-up provided in this section.

Surveillance Requirement 4.7.5.a verifies that the UHS is capable of providing a 30-day cooling water supply to safety-related equipment without exceeding its design basis temperature. The 24-hour frequency is based on operating experience related to trending of the parameter variations during the applicable modes. This surveillance requirement verifies that the average water temperature of the UHS is less than or equal to 75°F.

Surveillance Requirement 4.7.5.b requires that the UHS temperature be monitored on an increased frequency whenever the UHS temperature is greater than 70°F during the applicable modes. The intent of this Surveillance Requirement is to increase the awareness of plant personnel regarding UHS temperature trends above 70°F. The frequency is based on operating experience related to trending of the parameter variations during the applicable modes.

3/4.7.6 FLOOD PROTECTION

The limitation on flood protection ensures that the service water pump cubicle watertight doors will be closed before the water level reaches the critical elevation of 14.5 feet Mean Sea Level. Elevation 14.5 feet MSL is the level at which external flood waters could enter the service water pump cubicle.

and the pump cubicle sump drain valves will be closed

→ replace with: floor elevation of

3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

BACKGROUND

The control room emergency ventilation system provides a protected environment from which operators can control the unit following an uncontrolled release of radioactivity. Additionally, the system provides temperature control for the control room during normal and post-accident operations.

The control room emergency ventilation system is comprised of the control room emergency air filtration system and a temperature control system.

The control room emergency air filtration system consists of two redundant systems that recirculate and filter the control room air. Each control room emergency air filtration system consists of a moisture separator, electric heater, prefilter, upstream high efficiency particulate air (HEPA) filter, charcoal adsorber, downstream HEPA filter, and fan. Additionally, ductwork, valves or dampers, and instrumentation form part of the system.

Normal Operation

A portion of the control room emergency ventilation system is required to operate during normal operations to ensure the temperature of the control room is maintained at or below 95°F.

Attachment 3

Millstone Nuclear Power Station Unit No. 3
Proposed Revision to Technical Specification
Plant Systems - Flood Protection
(PTSCR 3-12-97)
Retyped Page

April 1997

RETYPE OF PROPOSED REVISION

Refer to the attached retype of the proposed change to the Technical Specifications. The attached retype reflects the currently issued version of the Technical Specifications. Pending Technical Specification revisions or Technical Specification revisions issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

PLANT SYSTEMS

3/4.7.6 FLOOD PROTECTION

LIMITING CONDITION FOR OPERATION

3.7.6 Flood protection shall be provided for the service water pump cubicles and components when the water level exceeds 13 feet Mean Sea Level, USGS datum, at the Unit 3 intake structure.

APPLICABILITY: At all times.

ACTION:

With the water level at greater than 13 feet above Mean Sea Level, USGS datum, at the Unit 3 intake structure, shut the watertight doors of both service water pump cubicles and close the pump cubicle sump drain valves within 15 minutes. |

SURVEILLANCE REQUIREMENTS

4.7.6 The water level at the Unit 3 intake structure shall be determined to be within the limits by:

- a. Measurement at least once per 24 hours when the water level is below elevation 8 feet above Mean Sea Level, USGS datum, and
- b. Measurement at least once per 2 hours when the water level is equal to or above elevation 8 feet above Mean Sea Level, USGS datum.

PLANT SYSTEMS

BASES

SURVEILLANCE REQUIREMENTS

For the surveillance requirements, the UHS temperature is measured at the locations described in the LCO write-up provided in this section.

Surveillance Requirement 4.7.5.a verifies that the UHS is capable of providing a 30-day cooling water supply to safety-related equipment without exceeding its design basis temperature. The 24-hour frequency is based on operating experience related to trending of the parameter variations during the applicable modes. This surveillance requirement verifies that the average water temperature of the UHS is less than or equal to 75°F.

Surveillance Requirement 4.7.5.b requires that the UHS temperature be monitored on an increased frequency whenever the UHS temperature is greater than 70°F during the applicable modes. The intent of this Surveillance Requirement is to increase the awareness of plant personnel regarding UHS temperature trends above 70°F. The frequency is based on operating experience related to trending of the parameter variations during the applicable modes.

3/4.7.6 FLOOD PROTECTION

The limitation on flood protection ensures that the service water pump cubicle watertight doors will be closed and the pump cubicle sump drain valves will be closed before the water level reaches the critical elevation of 14.5 feet Mean Sea Level. Elevation 14.5 feet MSL is the floor elevation of the service water pump cubicle.

3/4.7.7 CONTROL ROOM EMERGENCY VENTILATION SYSTEM

BACKGROUND

The control room emergency ventilation system provides a protected environment from which operators can control the unit following an uncontrolled release of radioactivity. Additionally, the system provides temperature control for the control room during normal and post-accident operations.

The control room emergency ventilation system is comprised of the control room emergency air filtration system and a temperature control system.

The control room emergency air filtration system consists of two redundant systems that recirculate and filter the control room air. Each control room emergency air filtration system consists of a moisture separator, electric heater, prefilter, upstream high efficiency particulate air (HEPA) filter, charcoal adsorber, downstream HEPA filter, and fan. Additionally, ductwork, valves or dampers, and instrumentation form part of the system.

Normal Operation

A portion of the control room emergency ventilation system is required to operate during normal operations to ensure the temperature of the control room is maintained at or below 95°F.

Attachment 4

Millstone Nuclear Power Station Unit No. 3
Proposed Revision to Technical Specification
Plant Systems - Flood Protection
(PTSCR 3-12-97)
Background and Safety Assessment

April 1997

Background

Technical Specification 3/4.7.6 requires flood protection be provided for the Service Water pump cubicles and components when the water level exceeds 13 feet Mean Sea Level, USGS datum, at the Unit 3 intake structure. A modification to the facility installed a drain line from the sump of each Service Water pump cubicle to the intake bay in order to provide a passive means of removing internal leakage from the cubicle and to improve internal flood protection for the cubicles. Closure of these valves is required to provide protection to the pump cubicles from external flooding when sea level exceeds 13 feet Mean Sea Level, USGS datum, at the Unit 3 intake structure.

Additionally, the Action Statement currently requires action to be initiated with the water level at 13 feet Mean Sea Level (MSL), USGS datum, at the Unit 3 intake structure. This is inconsistent with the Limiting Condition for Operation which requires action to be taken when the water level exceeds 13 feet MSL at the Unit 3 intake structure.

Furthermore, the Technical Specification Bases for 3/4.7.6 currently states that 14.5 MSL is the level at which external flood waters could enter the service water pump cubicle. Contrary to this 14.5 MSL is the floor elevation of the Service Water pump cubicle rather than the level at which external flood waters could enter the service water pump cubicle.

Safety Assessment

The drain valves which were installed as part of a plant modification meet the intent of RG 1.59 for "hardened protection" and RG 1.102 for "incorporated barriers" in a manner similar to that of the cubicle watertight doors. RG 1.59 states that hardened protection "must be passive and in place, as it is to be used for flood protection, during normal plant operation". RG 1.102 states that "the plant should be designed and operated to keep doors necessary for flood protection closed during normal operation". The Response to Final Safety Analysis Report (FSAR) Question No. 240.9 established the acceptability of the practice of maintaining one service water pump cubicle watertight door open and the other door closed during normal operations.

The cubicle sump drain valves are normally maintained in the open position to provide a passive means of removing internal leakage from the cubicle and to improve internal flood protection for the cubicles. The drain valves are category 1 valves that are periodically stroked under the plant maintenance program. The proposed change incorporates additional manual actions to provide external flood protection for the service water pump cubicles in the event water level exceeds 13 ft MSL by requiring that the cubicle sump drain valves be closed prior to the introduction of water from an external source.

The proposed change in the action statement to initiate action with water level exceeding 13 feet MSL rather than at 13 feet MSL is a clarification only which provides consistency between the limiting condition for operation and the action statements.

The proposed change in the Technical Specification Bases for 3/4.7.6 clarifies that 14.5 MSL is the floor elevation of the Service Water pump cubicle rather than the level at which external flood waters could enter the service water pump cubicle.

This proposed change:

- provides the necessary assurance that the same degree of external flood protection will be provided by performing an additional simple manual action.
- does not change the operation of any system or system component during normal or accident evaluations.
- considered safe because it will not result in the plant being operated in an unsafe condition, decrease available safety margins, nor adversely impact the consequences of an accident. It will cause no increase in the risk to the public health or safety. It does not increase either the probability of event occurrence, the probability of human errors mitigating the event, the probability of the failure of mitigating equipment, nor does it introduce any new accidents or equipment malfunctions.

Attachment 5

Millstone Nuclear Power Station Unit No. 3
Proposed Revision to Technical Specification
Plant Systems - Flood Protection

(P) SCR 3-12-97)

Significant Hazards Consideration and Environmental Considerations

April 1997

Significant Hazards Consideration

NNECO has reviewed the proposed change in accordance with 10CFR50.92 and has concluded that the change does not involve a significant hazards consideration (SHC). The bases for this conclusion is that the three criteria of 10CFR50.92(c) are not satisfied. The proposed change does not involve a SHC because the change would not:

1. involve a significant increase in the probability or consequence of an accident previously evaluated.

The proposed changes to Technical Specification 3.7.6 identify additional manual actions to be performed to provide external flood protection for the service water pump cubicles in the event of high water level (13 ft MSL). The cubicle sump drain valves which are to be closed are part of a modification which installed a drain line from the sump of each cubicle to the intake bay in order to provide a passive means of removing internal leakage from the cubicle. The cubicle sump drain valves are normally maintained in the open position.

The drain valves meet the intent of RG 1.59 for "hardened protection" and RG 1.102 for "incorporated barriers" in a manner similar to that of the cubicle watertight doors. RG 1.59 states that hardened protection "must be passive and in place, as it is to be used for flood protection, during normal plant operation". RG 1.102 states that "the protection should be designed and operated to keep doors necessary for flood protection closed during normal operation". The Response to FSAR Question No. 240.9 established the acceptability of the practice of maintaining one service water pump cubicle watertight door open and the other door closed during normal operations.

The proposed change in the action statement to initiate action when water level is exceeding 13 feet MSL rather than at 13 feet MSL is a clarification only which provides consistency between the limiting condition for operation and the action statements.

Therefore, the proposed changes do not involve a significant increase in the probability or consequence of an accident previously evaluated.

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

The proposed changes to Technical Specification 3.7.6 identify additional, simple to perform manual actions to provide external flood protection for the service water pump cubicles.

The proposed change in the action statement to initiate action when water level is exceeding 13 feet MSL rather than at 13 feet MSL and the proposed changes to the bases are considered clarifications.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes to Technical Specification 3.7.6 identify additional, simple to perform manual actions to provide external flood protection for the service water pump cubicles in the event of high water level (13 ft MSL). The plant modification which made these additional actions necessary was made to provide for improved internal flood protection.

The proposed change in the action statement to initiate action when water level is exceeding 13 feet MSL rather than at 13 feet MSL and the proposed changes to the bases are considered clarifications.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

In conclusion, based on the information provided, it is determined that the proposed change does not involve an SHC.

Environmental Considerations

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed change does not involve a SHC, does not significantly increase the type 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 categorical exclusion from the requirements of an environmental considerations.