

As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration (SHC), which is presented below:

\* \* \* The proposed changes do not involve a SHC because the changes would not:

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

The proposed changes revise the action requirements regarding operability testing of a non-affected DG when the other DG is inoperable, delete the requirement for operability testing of the DGs when one or both offsite AC sources are inoperable and eliminate the fast loading of DGs except for the 18-month test. These changes will improve DGs performance by reducing the number of unnecessary quick starts and by requiring more appropriate testing of the DGs when there is a potential for common mode failure. The proposed change, to revise the method of verifying DG hot restart capability after a 24-hour run without loading the DG with LOP/SI [loss of offsite power/safety injection] load, meets an intent of Regulatory Guide 1.108, Position C.2.a.5, which states the purpose of the test as to "demonstrate functional capability at full load temperature conditions." Functional capability of the DG can be adequately demonstrated by manually or automatically restarting the DG within five minutes after a 24-hour test run without loading it with LOP/SI loads, provided that a full load temperature condition is maintained prior to restart. The proposed DG restart method does not reduce the effectiveness of the test. The proposed revisions of the DG surveillance requirements will not increase the probability of an accident and it will not change the response of the DG to a LOP as described in the Millstone Unit No. 3 FSAR. Since the plant response to an accident will not change, there is no change in the potential for an increase in the consequences of an accident previously analyzed.

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

The proposed changes of the DG surveillance requirements and operability testing requirements do not affect the operation or response of any plant equipment or introduce any new failure mechanisms. The proposed changes do not affect the test results and the DGs will be verified to be operable and their response to a loss of voltage will be unchanged. The plant equipment will respond per the design

and analyses and there will not be a malfunction of a new or any type introduced by the revision to the DG surveillance requirements. As such, the changes do not create the possibility of a new or different kind of accident previously evaluated.

3. Involve a significant reduction in the margin of safety.  
The bases of Technical Specification 3/4.8, "Electrical Power Systems," state that the operability of the AC and DC power systems and associated distribution systems ensure that sufficient power will be available to supply the safety-related equipment required for safe shut down and mitigation and control of accident conditions. The bases also state that the surveillance requirements for determining the operability of the DGs are in accordance with the recommendations of Regulatory Guide 1.108, Revision 1. The revisions of the surveillance requirements establishes tests that will continue to verify that the DGs are operable and the testing will still meet the intent of Regulatory Guide 1.108, Revision 1. Operable DGs ensure that the assumptions in the bases of the Technical Specifications are not affected and ensure that the margin of safety is not reduced. Therefore, the assumptions in the bases of the technical specifications are not affected and these changes do not result in a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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*Northeast Nuclear Energy Company, et al., Docket No. 50-423, Millstone Nuclear Power Station, Unit No. 3, New London County, Connecticut*

*Date of amendment request:* December 14, 1994.

*Description of amendment request:* The proposed amendment would revise the Millstone Unit No. 3 Technical Specifications by:

1. Increasing the upper bound of the overall containment integrated leakage rate required by Technical Specification 3.6.1.2.a from 0.3 wt. % per day to 0.65 wt. % per day of the containment air per 24 hours at design basis pressure.

2. Revising Technical Specification 4.6.6.1.d.3 by providing more margin with respect to the drawdown time for secondary containment vacuum.

3. Revising Bases Section 3/4.7.9 to reflect the above changes.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration (SHC), which is presented below:

\* \* \* The proposed changes do not involve an SHC because the changes would not:

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

\* \* \* There is a reasonable assurance that the modified criteria for the negative pressure in the secondary containment boundary proposed via the proposed change (i.e., a negative pressure of 0.1 inches in one minute and a negative pressure of 0.4 inches within the next two minutes), can be accomplished in the prescribed time.

Extension of the time allowed to achieve the final drawdown of secondary containment from 120 seconds to 180 seconds (these times include the diesel generator start and load time of approximately 11 seconds) will have a negligible impact on heating and cooling. Plant experience has shown that heatup and cooldown of thick-walled concrete structures, such as the Millstone Unit No. 3 auxiliary building, is a relatively slow process. Also, natural convection within the auxiliary building tends to stabilize temperatures. Following an accident signal, ventilation equipment is restarted promptly. Therefore, heatup or cooldown, during short periods while ventilation fans and/or heaters are inactive, is insignificant and can be neglected.

The proposed change to reinstate the containment integrated leakage rate at the design basis pressure from 0.3 wt % per day to 0.65 wt % per day has been evaluated to determine the impact to the Appendix J requirements for Type A, B and C Testing. In addition, the radiological consequence evaluation also addressed the increase in  $L_a$  (i.e., from 0.3 wt % per day to 0.65 wt % per day).

On October 12, 1993, Millstone Unit No. 3 successfully conducted the second