

Type A test in the first 10-year service period. Test results indicated that the "As-Found" and "As-Left" ILRTs [integrated leakage rate tests] passed the technical specification acceptance criteria. The "As-Found" value was 0.1327 weight percent per day and the "As-Left" value was 0.1313 weight percent per day. These values represent 27.2% and 26.9% of the technical specification criterion of 0.4875 wt % per day ($0.75 L_a$), based on L_a equal to 0.65 wt % per day, respectively. In addition, as of October 9, 1993, the total Type B and C "As-Found" and "As-Left" leakage results were 0.099 wt % per day, and 0.084 wt % per day, respectively. These values represent approximately 25.3% and 21.5% of the technical specification limit of 0.39% wt % per day ($0.6 L_a$), based on L_a equal to 0.65 wt % per day, respectively. Correspondingly, the 1993 Type A, B, and C test results indicate that the "As-Found" and "As-Left" result in each test case was below the existing Technical Specification limit of 0.3 wt % per day. This further demonstrates the overall leakage integrity of the containment and its boundaries.

Based on the relatively low "As-Left" ILRT leakage rate (i.e., 0.1313 wt % per day is well below the existing technical specification limit of 0.225 wt % per day ($0.75 L_a$), based on L_a equal to 0.3 wt % per day), which represents the overall containment integrated leakage rate for the containment prior to start-up, there is reasonable assurance that containment integrity will be maintained below the allowable leakage rate limit of 0.65 wt % per day. In addition, the total Type B and C "As-Left" leakage result of 0.084 wt % per day (this is well below the existing technical specification limit of 0.18 wt % per day ($0.6 L_a$), based on L_a equal to 0.3 wt % per day), provides further assurance that leakage, based on individual penetration, will be maintained within sufficient margin of the leakage limits.

Because the last Type A, B, and C tests were performed under the technical specification limit of 0.65 wt % per day, the proposed change to restore L_a to 0.65 wt % per day has no impact to these systems from a leakage allowance perspective. As indicated above, the previous test results met the technical specification leakage limits (based on 0.65 wt % per day) within sufficient margin and, therefore, would not present any challenge to these leakage limits.

NNECO has evaluated the proposed changes to Surveillance Requirement 4.6.6.1.d.3 that increase the time to draw a final required negative pressure

as measured at the 24'-6" elevation of the auxiliary building in conjunction with the proposed change to reinstate the containment integrated leakage rate of 0.65 wt % per day to determine the impact on the offsite doses following a LOCA. The calculated radiological doses are, in most cases, less than the previously calculated doses (i.e., EAB [exclusion area boundary] and LPZ [low-population zone] doses) and are within the 10CFR100 limits. Previously, the EAB thyroid and whole body doses as documented in the November 4, 1993, submittal were calculated to be 141 REM and 9.4 REM respectively, while the previously docketed (i.e., the November 4, 1993, submittal) LPZ doses to the thyroid and whole body were calculated to be 29.8 REM and 1.7 REM respectively. Utilizing the revised application of containment recirculation spray DF, the EAB thyroid and whole body doses were calculated to be 61 REM and 16.7 REM, respectively, and the LPZ thyroid and whole body doses were calculated to be 10.9 REM and 2.8 REM respectively. The assumptions used in the above radiological dose calculations are provided in Attachment 1. It is noted that a LOCA at Millstone Unit No. 3 is also one of the bounding accidents for the Millstone Unit No. 3 control room, Millstone Unit No. 2 control room, and the Millstone Technical Support Center habitability analysis. Therefore, the doses for these areas were recalculated and are presented in the Safety Assessment section above. The Millstone Unit No. 1 control room and the Emergency Operating Facility doses are bounded by the Millstone Unit No. 1 LOCA calculations.

The Millstone Unit Nos. 2 and 3 control rooms and Millstone Technical Support Center doses were not recalculated in 1993 (i.e., November 4, 1993, submittal) since EAB/LPZ doses proved that the releases were less than the 1990 submittal. In summary, all control room and Technical Support Center doses are within the guidelines of GDC 19. Therefore, the proposed changes do not result in an increase in consequences of an accident (i.e., a LOCA) previously analyzed.

The proposed changes to Bases Section 3/4.6.6 do not have any safety impact since they only reflect the changes proposed to Surveillance Requirement 4.6.6.1.d.3.

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

The proposed changes do not compromise the ability of the SLCRS [supplementary leak collection and release system] and ABFS [auxiliary

building filter system] to mitigate the consequences of an accident. The proposed changes do not make any physical or operational changes to existing plant structures, systems or components. The proposed changes do not introduce any new or unique operational modes or accident precursors. Therefore, the proposed changes do 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.

NNECO has evaluated the proposed changes to Surveillance Requirement 4.6.6.1.d.3 that increase the time to draw a final required negative pressure as measured at the 24'-6" elevation of the auxiliary building in conjunction with the proposed change to reinstate the containment integrated leakage rate of 0.65 wt % per day to determine the impact on the offsite doses following a LOCA. The calculated radiological doses are, in most cases, less than the previously calculated doses and these doses are within the 10CFR100 limits. All control rooms and technical support center doses are within the guidelines of GDC 19. Therefore, the proposed changes do not involve 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 23, 1994.

Description of amendment request: The proposed amendment would change the acceptance criteria for the peak transient generator voltage from 4784 volts to 5000 volts during full load rejection tests of the diesel generator (DG), and delete the 10-year surveillance requirement to perform a