

110% pressure test of the DG fuel oil system.

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 a SHC because the changes would not:

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

DG Full-Load Rejection Test

NNECO is proposing to modify Surveillance Requirement 4.8.1.1.2.g.3 of the Millstone Unit No. 3 Technical Specifications by changing the acceptable transient voltage to 5000 volts from 4784 volts. This change will permit the DG full load rejection tests to be performed at realistic plant conditions using a power factor that will envelope the calculated power factor during the worst kW loading conditions. The transient voltage of 5000 volts is within the normal design limits of the DGs.

The proposed change does not alter the intent of the surveillance, does not involve any physical changes to the plant, does not alter the way any structure, system, or component functions, and does not modify the manner in which the plant is operated. As such, the proposed change to Surveillance Requirement 4.8.1.1.2.g.3 will not degrade the capability of the DGs to perform their intended safety function, and will not reduce the availability of the DGs. Actually, the proposed change will increase the effectiveness of the full load rejection tests, because the DGs will be tested in a configuration that is closer to the design basis conditions.

Pressure Test of the DG Fuel Oil System

The DG fuel oil system is classified as an ASME Code Class 3 system in accordance with the guidance of Regulatory Guide 1.26, "Quality Group Classification and Standards for Water-, Steam-, and Radioactive-waste Components of Nuclear Power Plants." Surveillance Requirement 4.0.5 requires the testing of ASME Class 1, 2, and 3 components in accordance with Section XI of the ASME Code. Surveillance Requirement 4.8.1.1.2.i.2 is redundant to the ASME Section XI pressure test requirements of Surveillance Requirement 4.0.5. Additionally, the DG fuel oil tank cannot be tested in the configuration required by Surveillance Requirement 4.8.1.1.2.i.2, because the

tanks are vented to the atmosphere and the vent cannot be isolated. Therefore, NNECO is proposing to delete Surveillance Requirement 4.8.1.1.2.i.2.

The proposed change does not modify the manner in which the DGs respond to an accident. Also, the proposed change does not reduce the reliability of the DGs.

Conclusion

Based on the above, the proposed changes to Surveillance Requirements 4.8.1.1.2.g.3 and 4.8.1.1.2.i.2 of the Millstone Unit No. 3 Technical Specifications do not involve a significant increase in the probability or consequences of an accident previously analyzed.

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

DG Full-Load Rejection Test

The DGs are required to operate in response to a loss of offsite power. Their failure cannot initiate an accident. Additionally, the proposed change to Surveillance Requirement 4.8.1.1.2.g.3 does not affect the operation or response of any plant structure, system, or component, and it does not introduce any new failure mechanisms.

Pressure Test of the DG Fuel Oil System

The proposed change to Surveillance Requirement 4.8.1.1.2.i.2 does not affect the design or function of the DG fuel oil system. Failure of the DG fuel oil system would not initiate an accident.

Conclusion

Based on the above, the proposed changes to Surveillance Requirements 4.8.1.1.2.g.3 and 4.8.1.1.2.i.2 of the Millstone Unit No. 3 Technical Specifications will not create the possibility of a new or different kind of accident from any previously evaluated.

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

DG Full-Load Rejection Test

NNECO is proposing to modify Surveillance Requirement 4.8.1.1.2.g.3 of the Millstone Unit No. 3 Technical Specifications by changing the acceptable transient voltage to 5000 volts from 4784 volts. The intent of the proposal is to permit the DG full load rejection tests to be conducted at conditions which simulate design basis conditions.

The proposed change does not alter the intent of the surveillance, does not involve any physical changes to the plant, does not alter the way any structure, system, or component functions, and does not modify the

manner in which the plant is operated. As such, the proposed change to Surveillance Requirement 4.8.1.1.2.g.3 will not degrade the ability of the DGs to perform their intended safety function, and will not reduce the availability of the DGs.

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 shutdown and for the mitigation of transients. The proposed change to the surveillance requirement will increase the effectiveness of the full load rejection tests.

This will ensure the operability of the DGs. Operable DGs ensure that the assumptions for the bases of the Millstone Unit No. 3 Technical Specifications are not affected.

Pressure Test of the DG Fuel Oil System

NNECO is proposing to delete Surveillance Requirement 4.8.1.1.2.i.2 from the Millstone Unit No. 3 Technical Specifications. This surveillance requirement is redundant to the requirements of Surveillance Requirement 4.0.5 which invokes ASME Section XI. Additionally, the fuel oil system cannot be tested to the requirements of Surveillance Requirement 4.8.1.1.2.i.2 because the DG fuel oil tanks are vented to the atmosphere and this vent path cannot be isolated.

Millstone Unit No. 3 will include the DG fuel oil system pressure test as an augmented inspection within the Inservice Inspection program. Inspections will be performed in compliance with the requirement of the 1983 Edition of ASME Section XI, Table IWD-2500-1, "Test and Examination Categories." Testing (i.e., a system hydrostatic test) in accordance with ASME Section XI will provide equivalent assurance of tank and piping integrity.

Conclusion

Based on the above, the proposed changes to Surveillance Requirements 4.8.1.1.2.g.3 and 4.8.1.1.2.i.2 of the Millstone Unit No. 3 Technical Specifications 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