



Northeast
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

November 7, 1994

Docket No. 50-423
B15029

Re: 50-423/93-81

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

Millstone Nuclear Power Station, Unit No. 3
Revision of Commitment
Contained in Reply to a Notice of Violation
Transmitted By Inspection Report No. 50-423/93-81

The intent of this letter is to eliminate a commitment that the Northeast Nuclear Energy Company (NNECO) submitted on March 18, 1994,⁽¹⁾ as part of a reply to a notice of violation.⁽²⁾ The violation pertained to the failure of the operators to recognize and respond to three alarms indicating the failure of a battery charger to supply its loads and maintain the associated battery in a fully charged state. In the reply to the notice of violation, NNECO made several commitments regarding corrective steps that would be taken to preclude further violations. One of these commitments involved a design change to enhance main board annunciation by providing a reflash capability to each battery trouble alarm. Originally, NNECO had planned to implement this design change during the next upcoming refueling outage. However, NNECO now intends to eliminate this design commitment based on the following discussion.

In 1994, a design change has been implemented which improves the ability of the operators to diagnose problems associated with the 125 VDC system. Annunciator bypass switches have been installed in each of the battery chargers to eliminate nuisance alarms for out-of-service battery chargers. This design change eliminated a regular source of lit annunciators.

-
- (1) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3, Reply to a Notice of Violation, Inspection Report No. 50-423/93-81," dated March 18, 1994.
- (2) J. T. Wiggins letter to J. F. Opeka, "Notice of Violation, NRC Inspection Report 50-423/93-81," dated February 16, 1994.

1001 1/0

U.S. Nuclear Regulatory Commission
B15029/Page 2
November 7, 1994

Additionally, other black board issues (e.g., reactor plant component cooling water, auxiliary boiler, boronometer, hydrogen analyzer, turbine plant component cooling water heat exchangers, control room HVAC, turbine lube oil, etc.) have been addressed which make significant strides towards achieving a black board condition during normal plant operations.

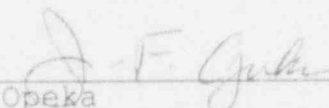
With these design changes implemented, NNECO firmly believes that the overall intent of the commitment has been met. The operators have four sources to indicate battery charger/DC bus trouble and significant strides that have been made to achieve a black board condition during normal operations. Also, the existing alarms provide information similar to an annunciator reflash. Therefore, NNECO no longer believes that it is necessary to provide a reflash capability for each battery trouble alarm.

The other commitments documented in the reply to the Notice of Violation submitted on March 18, 1994, have been either completed or their resolution is on schedule. The actions that have been completed concerned the trending of battery capacity over time, the discussing of the lessons learned with the control room operators, and the revising of Operating Procedure (OP) 3345C, "125 Volt DC." Also, as stated in the submittal dated March 18, 1994, the design change associated with the DC panel breakers is planned for implementation during the next refueling outage.

NNECO does not expect any written response to this letter, however, should the NRC Staff have any questions regarding this submittal, please contact Mr. G. P. van Noordennen at (203) 440-2084.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3
J. T. Wiggins, Acting Director, Division of Reactor Safety,
Region I