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Docket No. 50-423
B15983

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

Millstone Nuclear Power Station Unit 3
Change in Schedule for Submittal of Licensee Event Report Supplements

The purpose of this letter is to provide Northeast Nuclear Energy Company's (NNECO) updated schedules for the submittal of supplements to Licensee Event Reports (LER) 96-21-00, 96-15-01 and 96-28-00. The changes in schedule were discussed in telephone conversations between J. P. Durr of the NRC and J. M. Peschel of NNECO on October 24 & 29, 1996.

LER 96-21-00: This LER was submitted on June 28, 1996 to document inadequacies in the In Service Test (IST) Program. However, we neglected to note that a supplement would be submitted. In discussions with the Resident Inspector, we committed to submit an updated LER by October 31, 1996. At the time of the commitment, we had not planned to perform a formal root cause analysis. In subsequent discussions with the Resident Inspector we committed to perform a root cause analysis consistent with our revised Corrective Action Program. This root cause analysis for the LER has not been completed. Therefore, to preclude submitting two supplements, NNECO will submit an LER supplement with the results of the root cause analysis by December 15, 1996.

LER 96-15-01: This LER was submitted on September 5, 1996 to provide updated information regarding inadequate electrical separation between reactor protection trains. We committed to submit a supplement by November 4, 1996 to provide the final inspection results, the conclusions of the root cause analysis and the required corrective actions. Similar to LER 96-21-00, we now want to

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perform this root cause analysis consistent with our revised Corrective Action Program. Therefore, we will submit the LER supplement with the final inspection results, the conclusions of the root cause analysis and the required corrective actions by November 22, 1996.

LER 96-28-00: This LER was submitted on September 23, 1996 to document a potential to overcool the charging pump lube oil system. NNECO committed to identify and implement corrective actions to address the potential overcooling by November 1, 1996. We originally intended to modify the plant to eliminate any potential overcooling. Subsequently, it was determined that the charging pump lube oil system could be qualified to withstand the potential lower service water temperatures. We believe that qualification is the preferred corrective action. We are currently evaluating both options. The LER supplement will be submitted by December 15, 1996.

We are committed to completing future required evaluations within the original thirty (30) day period and avoid submitting unnecessary LER supplements. In the interim, the status of LER preparation and/or supplements are being reviewed at our daily status meeting to ensure root cause analysis and corrective actions are completed in a timely fashion to support the scheduled submittal. In addition, we are currently revising our root cause analysis process, using the techniques and concepts of Failure Prevention & Investigation (FPI), as part of our Corrective Action Program upgrade. We believe that revising the LER supplement submittal date to allow the use of this new root cause analysis methodology is appropriate and will provide substantial benefits to our Corrective Action Program in the long term.

Should you have any questions regarding these schedule changes, please contact J. M. Peschel at (860) 437-5840.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



John Paul Cowan
Recovery Officer
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cc: H. J. Miller, NRC Region I Administrator
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