General Offices * Selden Street, Barlin, Connecticut

P.O. BOX 270 HARTFORD, CONNECTICUT 08141-0270 (203) 605-5000

July 13, 1992

Docket No. 50-423 B14184

Re: 10CFR50.90

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

Reference: J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Proposed Revision to Technical Specifications, Increased Surveillance Test Intervals and Allowed Outage Times for the Reactor Protection System and Engineered Safety Features Actuation System," dated March 3, 1992.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3 Proposed Revision to Technical Specifications Increased Surveillance Test Intervals and Allowed Outage Times for the Reactor Trip System and Engineered Safety Features Actuation System (TAC No. 83015)

In a letter dated March 3, 1992 (Reference), Northeast Nuclear Energy Company (NNECO) proposed to amend Operating License NPF-49 by revising the Millstone Unit No. 3 Technical Specifications regarding surveillance requirements for the Reactor Trip System (RTS) and Engineered Safety Features Actuation System (FSFAS). Specifically, the proposed amendment would revise the Millstone Unit No. 3 Technical Specifications to increase the surveillance test interval (STI), allowed outage time, and channel bypass times for certain instrumentation in the RTS and ESFAS. To address the setpoint drift issue related to the extended STIs, NNECO performed a review of the plant's past one-year surveillance data sheets. Based upon this review, NNECO (in the referenced letter) concluded that the instrument drift was acceptable and that the increase in surveillance test intervals from one month to three months would not have a significant impact on normal plant operation.

The purpose of this letter is to document our commitment as we agreed to in our conference call with the Staff on June 24, 1992. For those ESFAS channels with extended STI herein, a review of as found" and "as left" data for the past one additional year (12 month period) for each affected channel will be collected and, if necessary, setpoints and allowable values will be changed if this data indicates a need to do so. Based on our experience to date, we do not foresee this being the case.

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We believe the above commitment, coupled with the information provided in the referenced letter, provides a complete basis for approval of the requested amendment. Of course, should the Staff have any additional questions, NNECO will be available to discuss the Staff's concerns.

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

W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

Mr. Kevin McCarthy Director, Radiation Control Unit Department of Environmental Protection Hartford, Connecticut 06116

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me, J. F. Opeka, who being duly sworn, did state that he is Executive Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensee herein, and that the statements contained in said information are true and correct to the best of his knowledge and belief.

Notary Public

My Commission Expires March 31, 1993