

**Northeast
Nuclear Energy**

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The Northeast Utilities System

MAY 15 1998

Docket No. 50-423
B17249

RE: LER 98-002-00

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

Millstone Nuclear Power Station Unit 3
Revision Of Commitment to Revise Technical Specifications BASES Section
4.5.2 to Clarify Emergency Core Cooling System Venting Process
Information

The purpose of this letter is to notify the Nuclear Regulatory Commission of a completion date extension to a commitment from Licensee Event Report (LER) 98-002-00, "Verification of ECCS Piping Full of Water per Technical Specification [TS] 4.5.2.b.1 Not Being Met." In this commitment, Northeast Nuclear Energy Company (NNECo) committed to implementing the following corrective action prior to May 15, 1998: "A Technical Specifications BASES section change will be prepared and implemented to clarify Emergency Core Cooling System [ECCS] venting process information." NNECo is extending the completion date to August 15, 1998 based on the justification described below.

The ECCS TS requires verifying that the ECCS piping is filled "full of water" at least once every 31 days. Pursuant to the guidance represented in the TS BASES, this is accomplished by venting the ECCS high points. The purpose of the commitment was to clarify the BASES verbiage to allow flexibility in the performance of this verification using supplemental methods (such as ultrasonic testing), providing a reliable process to detect trapped gases in certain portions of ECCS piping determined to be susceptible to gas accumulation.

This clarification does not impact unit safety or operability since the surveillance procedure which verifies that the ECCS piping is indeed "full of water," was modified prior to the unit entering Mode 4 and provides an acceptable process for venting the piping segment reported in the LER and meets the requirement of

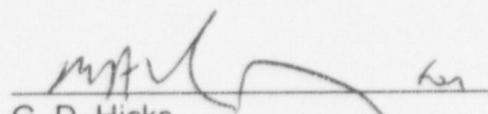
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the TS. Since the TS requirement is satisfied using current methods, there is no adverse operational or safety impact created by extending the completion of this commitment.

Our revised commitment is provided in Attachment 1. Should you have any questions regarding this matter please contact Mr. David A. Smith at (60) 437-5840.

Very truly yours,

NORTHEAST NUCLEAR ENERGY
COMPANY


G. D. Hicks
Director - Millstone Unit 3

Attachment: 1) NNECO's revised commitment in response to LER 98-002-00

cc: H. J. Miller, Region I Administrator
W.D. Travers, PhD, Director, Special Projects Office
J. W. Andersen, NRC Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
CA Group Files (CR M3-97-4131)

SCN:sn

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Attachment 1

Millstone Nuclear Power Station Unit 3
Revision Of Commitment to Revise Technical Specifications BASES Section
4.5.2 to Clarify Emergency Core Cooling System Venting Process Information

May 1998

Enclosure
List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Please notify the Manager - Nuclear Licensing at the Millstone Nuclear Power Station Unit No. 3 of any questions regarding this document or any associated regulatory commitments.

Number	Commitment	Committed Date or Outage
B17249-01	A Technical Specifications BASES section change will be prepared and implemented to clarify Emergency Core Cooling System venting process information.	August 15, 1998