January 21, 2000

MEMORANDUM TO: Docket File

FROM: Jacob I. Zimmerman, Project Manager, Section 2 ORIG SIGNED BY:
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE UNITS 2 AND 3 - PLACEMENT OF A DOCUMENT IN THE PUBLIC DOCUMENT ROOM

The attached topics of discussion were emailed to Ravi Joshi of Northeast Nuclear Energy Company. These items will be used to facilitate discussions during an upcoming conference call between the NRC and SNC staff. This document neither constitutes a formal request for information nor does it represent a formal NRC staff position.

Docket Nos. 50-336 and 50-423

Attachment: As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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REQUEST FOR CLARIFICATION OF RAI RESPONSES
MILLSTONE NUCLEAR POWER STATION, UNITS 2 & 3

Reference: Letter from Raymond P. Necci (NNECO) to NRC, "Responses to NRC RAI and Amendment to Relief Request Dated April 22, 1999," December 13, 1999.

The staff is continuing to review the original relief request dated April 22, 1999, supplemented by the responses in the Reference. The staff found that the responses to some of the questions, as described below, need clarifications to complete its review.

1. Subsections IWE and IWL of the 1998 Code deviate from the general requirements contained in IWA-2000 and allow the use of owner-defined requirements in some areas (i.e., acceptance criteria, minimum personnel qualifications, etc.). As such, the 1998 Code must be augmented to maintain industry-wide consistency. In the NRC RAI, the licensee was requested to provide specific details of the Millstone General and Detailed Visual examination program. The following clarifications are required to establish that the proposed alternative provides an acceptable level of quality and safety.

   a) The licensee provided information regarding the acceptance criteria for the General Visual, but did not provide similar information for the Detailed Visual examination. Provide the acceptance criteria to be used for the Detailed Visual examination.

   b) The licencee provided a few details and a list of the topics covered by the *NNECO Containment Inspection Manual* to address personnel training and qualification requirements. However, the licensee has not provided enough specific details to support the determination that the owner-defined program provides an acceptable level of quality and safety. Provide a detailed comparison describing how the proposed owner-defined program is consistent with IWA-2000 of the 1992 Code with the 1992 Addenda or the current acceptable Code of record.

   c) In some cases, the qualifications appear to describe an existing individual (see examples below). Do these descriptions represent the minimum qualifications for the stated individuals? Will replacements have equivalent qualifications? Provide a clarification regarding the qualifications of personnel performing containment examinations.

      Prerequisites for Responsible Individual (IWE) -

      The IWE Responsible Individual is knowledgeable in the requirements for design, inservice inspection and testing of Class MC and metallic liners of Class CC components. The IWE Responsible Individual graduated from a four-year accredited engineering or science college or university and has a minimum of 10 years civil engineering work experience at a nuclear facility.

      Prerequisites for Visual Inspector (IWE/IWL) -

      The Visual Inspector has graduated from a four-year accredited engineering or science college or university and has a minimum of 5 years work experience at a nuclear facility or an equivalent combination of education and experience. The

Attachment

Visual Inspector has completed training and meets qualification requirements specified in the Program Manual.

2. The licensee provided a description of procedure qualification as requested in the NRC RAI. In general, the description provided appears reasonable except for the use of a 1/32 inch division on a machinist scale which may not represent a consistent standard. Describe how the consistency of the selected standard will be maintained. Were other commonly used industry standards considered (i.e., 1/32 inch line on 18% neutral gray card)?

3. In the draft response to the NRC RAI, the licensee refers to the NNECO *Protective Coatings & Linings Program Manual* to address base metal condition prior to the application of coatings and linings. However, the licensee has not provided a clear commitment as to how the condition of the base metal will be verified. The licensee stated, in part:

   NNECO concurs that IWE-2500(b) paint or coating examination requirements should be performed prior to reapplication of the paint or coating, and should invoke detailed examinations, either detailed visual or augmented, as conditions require. NNECO also concurs that examinations should be performed by qualified inspection personnel.

   The appropriate Coatings Program procedures will be updated to require IWE/IWL Program notification in the event a coating or recoating application is planned. This notification will permit the IWE/IWL Responsible Engineer to conduct inspections prior to coating removal, base metal examination, and preservice examination prior to return to service, as required.

   Describe how the coating program procedures will ensure that the base metal will be thoroughly examined prior to paint or coating application at Millstone 2 and 3.

4. To address the acceptance criteria for material loss of metallic liners (Class CC), the licensee cites concurrence with a Texas Utilities submittal dated June 8, 1999. However, it is unclear how the licensee will address Class CC metallic liners at Millstone 2 and 3. Confirm that the acceptance criteria for Class MC liners will be used for Class CC metallic liners (evaluation or repair of areas exceeding 10% material loss).

5. Regarding the visual examination of disassembled bolted connections, the licensee cited concurrence with a Texas Utilities submittal dated March 26, 1999, however, made no commitment to perform visual examination of disassembled bolted connections. Other plants have committed to perform either detailed or VT-1 visual examinations of disassembled bolted connections. Confirm that a detailed visual (or VT-1) examination will be performed on disassembled bolted connections. Also confirm that bolted connections are limited to equipment and personnel hatches, and electrical penetrations.