



**Northeast
Nuclear Energy**

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Millstone Nuclear Power Station
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The Northeast Utilities System

FEB 25 2000

Docket Nos. 50-336
50-423

B18005

Re: 10 CFR 50.55a(a)(3)(i)

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

**Millstone Nuclear Power Stations, Unit Nos. 2 and 3
Inservice Inspection on Class MC and Class CC Components
Alternative to Requirements of ASME Section XI**

In the Federal Register, dated August 8, 1996 (61 FR 41303), 10 CFR 50.55a was amended to incorporate by reference the ASME Code Section XI, 1992 Edition with the 1992 Addenda of Subsections IWE and IWL for expedited examination of containments. On April 22, 1999, in accordance with provisions of 10 CFR 50.55a(a)(3)(i), Northeast Nuclear Energy Company (NNECO) submitted Relief Requests RR-E1 and RR-L1, along with line-by-line comparisons for the 1998 Edition to the 1992 Edition with the 1992 Addenda.⁽¹⁾

On December 13, 1999, NNECO amended its request to use the 1998 Edition of ASME Section XI for Subsections IWE and IWL as an alternative to the 1992 Edition of ASME Section XI, by proposing to use the 1998 Edition of ASME

⁽¹⁾ R. P. Necci to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 2 and 3, Inservice Inspection on Class MC and Class CC Components, Alternative to Requirements of ASME Section XI," dated April 22, 1999 (B17598).

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Section XI, including the 1999 Addenda⁽²⁾. Since Staff and INEL reviews of the amended request could not be completed prior to the Millstone Unit No. 2 outage in April, 2000, NNECO retracted its request to use the 1999 Addenda⁽³⁾.

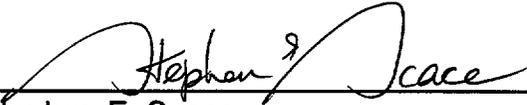
In our letter of February 11, 2000⁽³⁾ we stated that the requirements of IWA-2314 and NNECO's written practice are comparable. This conclusion was based on the certification and recertification responsibilities of the NDE Level III examiner being replaced by the training and qualification documentation responsibilities assigned to the Responsible Individual/Engineer as stipulated in IWE/IWL-2320(b). Internally, the term "certified" is reserved for NDE Level III involvement. To avoid any misinterpretation, the term "certified" is being replaced by the phrase "trained and qualified" within our IWE/IWL manual and procedures. This clarification also applies to our previous submittals⁽²⁾⁽³⁾ on the subject of IWE/IWL personnel training and qualification. The level of quality and safety of the NNECO Containment Inspection Program is not affected by this change.

There are no regulatory commitments contained in this letter.

Should you have any questions regarding this matter, please contact Mr. R. G. Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Stephen E. Scace
Director - Nuclear Oversight and
Regulatory Affairs

cc: See next page

⁽²⁾ R. P. Necci to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 2 and 3, Inservice Inspection on Class MC and Class CC Components, Alternative to Requirements of ASME Section XI," dated December 13, 1999 (B17927).

⁽³⁾ S. E. Scace to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 2 and 3, Inservice Inspection on Class MC and Class CC Components, Alternative to Requirements of ASME Section XI," dated February 11, 2000 (B17985).

cc: H. J. Miller, Region I Administrator
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3