



**Northeast
Nuclear Energy**

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The Northeast Utilities System

APR 12 2000

Docket No. 50-423
B17983

Re: 10 CFR 50.54(f)
10 CFR 50.55a(f)(5)(iv)
10 CFR 50.55a(g)(5)(iv)

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

Millstone Nuclear Power Station, Unit No. 3
Response to Request for Additional Information On Second 10-Year
Interval Inservice Inspection Plan Request For Relief (TAC No. MA5446)

This letter is provided in response to a Request for Additional Information (RAI) by Nuclear Regulatory Commission (NRC) letter,⁽¹⁾ dated January 5, 2000, concerning Northeast Nuclear Energy Company's (NNECO) submittal⁽²⁾ of the Inservice Testing (IST) and Inservice Inspection (ISI) Programs and "Requests For Relief" from Code requirements as necessary, for the implementation of the Second 10-Year Interval Programs at Millstone Unit No. 3.

This RAI was issued on January 5, 2000. It requested that a response be provided to the NRC Staff no later than February 4, 2000. Due to the issues raised by RAI question No. Two, an extension of the required submission date until April 15, 2000, was granted by V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3 in telephone discussions with Ravi Joshi of the Regulatory Affairs Department at Millstone Point Nuclear Power Station.

⁽¹⁾ J. A. Nakoski to R. P. Necci, "Millstone Nuclear Power Station, Unit No. 3 - Request For Additional Information On Second 10 Year Interval Inservice Inspection Program Plan Request For Relief (TAC No. MA5446)," dated January 5, 2000.

⁽²⁾ R. P. Necci to U.S. NRC, "Millstone Nuclear Power Station, Unit No. 3, Second 10-Year Interval Inservice Inspection and Test Programs (B17752)," dated April 27, 1999.

A047

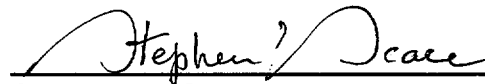
The responses to the questions contained within the letter of January 5, 2000, are provided in Attachment 1.

There are no regulatory commitments contained within this letter.

Should you have any questions regarding this submittal, please contact Mr. David W. Dodson at (860) 447-1791, ext. 2346.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, reading "Stephen E. Scace", is written over a horizontal line.

Stephen E. Scace
Director - Nuclear Oversight and
Regulatory Affairs

Attachment 1: Response to Request for Additional Information Concerning

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

Attachment 1

Millstone Nuclear Power Station, Unit No. 3

Response to Request for Additional Information On Second 10-Year
Interval Inservice Inspection Program Plan
Request For Relief (TAC No. MA5446)

April 2000

Response to Request for Additional Information Concerning

Question 1

1. Request for Relief No. IR-2-08:

Code Case N-533, Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure-Retaining Bolted Connections, does not provide details of the examination parameters for the system pressure test. As a condition for use of this Code Case, the NRC requires that the system pressure test and corresponding VT-2 visual examination with the insulation in place is to be performed with a minimum 4-hour hold time after attaining a test pressure of not less than the nominal operating pressure associated with 100 percent rated reactor power. The 4-hour hold allows time for leakage to penetrate the insulation, providing a means of detecting any significant leakage with the insulation in place. Specific details concerning the hold time associated with the proposed alternative were not provided in the submittal. Please provide information on the hold times used for inspecting insulated pressure-retaining bolted connections that demonstrates that this condition (a 4-hour hold time) is met.

Response to Question 1

NNECO accepts the position that "the system pressure test and corresponding VT-2 visual examination with the insulation in place is to be performed with a minimum 4-hour hold time after attaining test pressure of not less than 100 percent rated reactor power" as a condition for the use of Code Case N-533.

Applicable plant procedures will be revised to incorporate the requirement that there be a minimum 4-hour hold time after attaining test pressure of not less than 100 percent rated reactor power when performing a system pressure test and corresponding VT-2 visual examination with the insulation in place

Question 2

2. Request for Relief No. IR-2-09:

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee proposed the use of Code Case N-546, Requirements for Qualification of VT-2 Examination Personnel, Section XI, Division 1. To find this Code Case acceptable for use, the NRC has determined that the following conditions must be met:

The licensee must:

- a. Qualify examination personnel by test to demonstrate knowledge of Section XI and plant-specific procedures for VT-2 visual examination,**

AND

- b. Re-qualify examination personnel in accordance with the frequency specified in IWA-2314.**

Response to Question 2

NNECO questions the need for the following requirements during the 2nd Inspection Interval in order to use Code Case N-546:

1. Qualify examination personnel by test to demonstrate knowledge of Section XI and plant specific procedures for VT-2 examination and
2. Re-qualify examination personnel with the frequency specified in IWA-2314.

By letter dated March 20 1996, NNECO requested approval to use code case N-546 for the units owned by Northeast Utilities at that time.⁽³⁾ These included Millstone Unit No. 1, Millstone Unit No. 2, and Millstone Unit No. 3, as well as Haddam Neck, and Seabrook. The NRC provided approval to use Code Case N-546 by letter dated September 13, 1996.⁽⁴⁾ This approval did not include the need for the requirements identified in items 1 and 2 (above). In addition, the approval granted by letter dated July 22, 1998⁽⁵⁾ to Millstone Unit No. 2 for use of Code Case N-546 during their 3rd Interval submittal did not incorporate these additional requirements.

Currently, plant personnel are trained to perform VT-2 examination at Millstone Unit No. 2 and Unit No. 3 consistent with the requirements contained within Code Case N-546 as previously approved. The training program that has been implemented, documents the qualifications, training, and visual acuity of these

⁽³⁾ F. R. Dacimo to U.S.N.R.C, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Seabrook Station, Request To Use An Alternative To ASME Code Section XI," dated March 20, 1996.

⁽⁴⁾ P. F McKee to T. C Feigenbaum, "Haddam Neck Plant, Seabrook Station, Millstone Nuclear Power Station, Units 1, 2, And 3 - Request To Use An Alternative To ASME Code Section XI (TAC Nos. M95240, M95241, M95242, M95243, and M95244)," dated September 13, 1996.

⁽⁵⁾ P. F McKee to M. L. Bowling Jr., "Evaluation of the Third 10-Year Interval Inspection Program Plan and Associated Requests for Relief for Millstone Nuclear Power Station, Unit No. 2 (TAC No. M96200)," dated July 22, 1998.

individuals and maintains records supporting the current requirement that conditions of the Code Case be met. It is NNECO's contention that the imposition of the requirement to test these individuals to perform this work specifically at Millstone Unit No. 3 introduces an excessive administrative burden with no significant increase in safety and that since this requirement had not been applied in previous requests to use this Code Case, it should not be applied at this point in time.

NNECO will comply with any stipulations applicable to Code Case N-546 at such time in the future as they are incorporated within the guidance provided by Regulatory Guide 1.147.