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The Northeast Utilities System

JUN 21 2000

Docket No. 50-423
B18146

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

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

**Millstone Nuclear Power Station, Unit No. 3
Revision to the Second 10-Year Interval
Inservice Inspection and Test Programs**

The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) with a revision to the Millstone Unit No. 3 Inservice Inspection Program (ISI). Northeast Nuclear Energy Company (NNECO) previously submitted this Program to the NRC in a letter dated April 27, 1999.⁽¹⁾

During discussion with members of the NRC Staff, it was determined that Relief Request IR-2-06, "Utilization of Code Case N-566", contained within Attachment 2 to our submittal of April 27, 1999, did not adequately address concerns expressed by the Staff. As a result, NNECO has revised this Relief Request to utilize the American Society of Mechanical Engineers (ASME) Code Case N-566-1 "Corrective Action for Leakage at Bolted Connections, Section XI, Division I." This revised Relief Request directly replaces pages 158 and 159 of Attachment 2 to the submittal of April 27, 1999, and is provided as Attachment 1 to this letter.

There are no regulatory commitments contained within this letter.

If there are any questions concerning this letter, please contact Mr. Ravi 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

⁽¹⁾ R. P. Necci to the Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit No. 3 Second 10-Year Interval Inservice Inspection and Test Programs," dated April 27, 1999.

RGN-001

A047

Attachment (1): Relief Request for Utilization of Code Case N-566-1

**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**

Docket No. 50-423
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Attachment 1

Millstone Nuclear Power Station, Unit No. 3

Relief Request for Utilization of Code Case N-566-1

June 2000

Attachment 1

Relief Request for Utilization of Code Case N-566-1

Relief Request: IR-2-06, Rev. 1, Utilization of Code Case N-566-1

Component Identification: Bolted connections

Code Requirements:

Pursuant to 10 CFR 50.55a(b)(2), components (including supports) which are classified as ASME Code Class 1, Class 2, and Class 3 must meet the requirements set forth in the 1989 Edition of the ASME Boiler and Pressure Vessel Code. IWA-5250(a)(2) requires all bolting to be removed for examination and evaluation when leakage occurs at a bolted connection.

Code Relief Request:

Authorization is sought to utilize Code Case N-566-1 as an alternative to the requirements of the ASME Boiler and Pressure Vessel Code specified in 10 CFR 50.55a(g)(4).

Basis for Relief:

A number of problems have been identified with this Code requirement:

- IWA-5250(a) directs that a VT-3 be performed of the removed bolt in accordance with IWA-3100. IWA-3100 does not contain acceptance criteria for VT-3 of bolting.
- The Code does not require that the leakage be stopped; therefore, after pulling and examining the bolt, the leakage may continue.
- Removing one bolt at a time, the leakage may become even worse than originally found.
- The Code does not address integrity of the joint.
- Bolts can be damaged when being removed.
- The Code requires removing the bolting even if the leakage is minor, can be monitored, or if there is no corrosion concern. This can impact startup, cause hardship, and increase exposure without a commensurate increase in safety.

A Special Task Group within the ASME BPVC Section XI Subcommittee has addressed through-wall and mechanical joint leakage. They have concluded that structural integrity does not imply leak tightness. IWB-3142.4 allows acceptance of relevant conditions by analytical evaluation. It is felt that this can be applied to leakage from mechanical connections. Therefore, Code Case N-566-1 allowed for the engineering evaluation of the integrity of bolted joint connections.

Since compliance with the existing Code requirement results in hardship or unusual difficulty without a compensating increase in the level of quality and safety, and the alternative in the Code Case provides a level of quality and safety equivalent to other components evaluated under IWB-3142.4, authorization to utilize Code Case N-566-1 is requested pursuant to 10 CFR 50.55a(a)(3)(i).

Proposed Alternatives:

The alternative rules set forth in Code Case N-566-1 will be used for the engineering evaluation of joint integrity. A VT-1 visual examination of the accessible bolting surfaces, with the bolting in-place under tension, shall be performed.