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The Northeast Utilities System

DEC 12 2000

Docket Nos. 50-336
50-423
B18258

RE: 10 CFR 50.55a(f)(4)(iv)

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

Millstone Nuclear Power Station, Unit Nos. 2 and 3
Inservice Test Program Request to Implement Appendix II,
"Check Valve Condition Monitoring Program," of the OM Code

In accordance with 10 CFR 50.55a(f)(4)(iv), Northeast Nuclear Energy Company (NNECO) requests approval to implement Appendix II, "Check Valve Condition Monitoring Program," to the 1995 Edition and 1996 Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants (i.e., OMa - 1996 Code), in advance of incorporating the OMa - 1996 Code as the Code of Record for the Millstone Unit Nos. 2 and 3 Inservice Test (IST) Check Valve Programs.[1] The condition monitoring program would allow certain flexibility in establishing the types of test, examination, and preventive maintenance activities and their associated intervals, when justified based on the performance and operating condition of check valves.

In the Nuclear Regulatory Commission (NRC) amendment to 10 CFR 50.55a regulations, published in the Federal Register on September 22, 1999,[2] the NRC amended its regulations to incorporate by reference the 1995 Edition and 1996 Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants. The final rule revised, in part, the IST requirements for check valves. The rule provided

(1) Current Code of Record for the IST Programs of Millstone Unit Nos. 2 and 3 is ASME/ANSI OM - 1987 and Addendum OMa - 1988. The Third Ten-Year Interval for Millstone Unit No. 2 Began April 1, 1999. The Second Ten-Year Interval for Millstone Unit No. 3 Began February 7, 1998.

(2) NRC Final Rule 10 CFR Part 50 "Industry Codes and Standards; Amended Requirements," (64 FR 51370 to 51400), dated September 22, 1999.

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for implementation of a check valve condition monitoring program under Appendix II as an alternative to the testing or examination provisions contained in Subsection ISTC (Inservice Testing Code), with three modifications contained in the rule under 10 CFR 50.55a(b)(3)(iv). As stated in the rule, the following modifications to Appendix II are required when implementing Appendix II of the OMa -1996 Code:

(A) Valve opening and closing functions must be demonstrated when flow testing or examination methods (non-intrusive, or disassembly and inspection) are used;

(B) The initial interval for test and associated examinations may not exceed two fuel cycles or 3 years, which ever is longer; any extension of this interval may not exceed one fuel cycle per extension with the maximum interval not to exceed 10 years; trending and evaluation of existing data must be used to reduce or extend the time interval between test.

(C) If the Appendix II condition monitoring program is discontinued, then the requirements of ISTC 4.5.1 through 4.5.4 must be implemented.

NNECO will comply with these modifications to Appendix II as they have been stated in 10 CFR 50.55a(b)(3)(iv) to support the inservice testing of check valves, subject to an approval by the NRC to allow implementation of the check valve portion of the ASME OMa-1996 Code. Upon approval by the NRC, the implementation of the ASME OMa-1996 Code, Appendix II and the required modifications, will be phased in for the check valves in the IST Programs at Millstone Unit Nos. 2 and 3. An approval from the NRC to a similar request by Commonwealth Edison Company was issued on June 7, 2000.[3]

The implementation of the 1995 Edition with the 1996 Addenda of the ASME OM Code, including Appendix II, will improve the performance of check valves and will optimize testing, examination, and preventive maintenance. Appendix II properly focuses testing, monitoring, or examination activities on problem valves, and away from valves that exhibit acceptable performance. Condition monitoring, as described in Appendix II, is a new Code approach with a promise of better detection of check valve degradation, improved valve performance, and maintaining reliable component capability over extended intervals, while adjusting test and examination intervals. The modifications to Appendix II contained in the rule provide for a safe and prudent progression of extending test and examination intervals consistent with historical experience and performance expectations. In addition, the modifications to Appendix II noted above allow a licensee to conduct self-compliance inspections and minimize the expenditure of licensee and NRC resources.

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[3] NRC letter from D. M. Skay, "Approval to Implement a Check Valve Inservice Testing Program Using ASME OM Code - 1995 Edition, OMa-1996 Addenda at the Commonwealth Edison Company Nuclear Stations," dated June 7, 2000.

In the statement of consideration of the amendment to 10 CFR 50.55a (64 FR 51388), the NRC stated it would "favorably consider a request by a licensee under 10 CFR 50.55a(f)(4)(iv) to apply Appendix II in advance of incorporating the 1995 Edition with 1996 Addenda of the ASME OM Code as its Code of Record if the licensee's request justifies: (1) The modifications to Appendix II contained in the rule have been satisfied, and (2) All portions of the 1995 Edition with the 1996 Addenda of the OM Code that apply to check valves are implemented for the remaining check valves not included in the Appendix II program." Consistent with the above expectations, NNECO is committing to fully implement the ASME OMa-1996 Code, Appendix II, and the required modifications of 10 CFR 50.55a(b)(3)(iv) for the IST Program check valves at Millstone Unit Nos. 2 and 3.

NNECO requests the NRC's approval to implement the check valve portion of the ASME OMa-1996 Code Addenda including Appendix II, by January 31, 2001, to support timely implementation of this request for the upcoming refueling outage for Millstone Unit No. 3, currently scheduled for February 3, 2001. The implementation of the ASME OMa-1996 Code Addenda, Appendix II and the required modifications, will be phased in for all check valves in the IST Programs at Millstone Unit Nos. 2 and 3. NNECO will complete the full implementation of the check valve portions of ASME OMa-1996 Code Addenda, Appendix II, and the required modifications by March 31, 2004, for both Millstone Unit Nos. 2 and 3. This time is necessary given the extensive evaluation that a number of valves will require to ensure proper implementation of the new requirements.

The regulatory commitment contained within this letter is included in Attachment 1.

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

Robert G. Lizotte
Master Process Owner - Assessment

Attachment (1)

cc: H. J. Miller, Region I Administrator
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
S. R. Jones, 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

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 2 and 3

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies the action committed to by NNECO in this document.

Number	Commitment	Due
B18258-01	The check valve portion of the 1995 Edition with the 1996 Addenda of the ASME OM Code, Appendix II, and the required modifications to Appendix II stated in 10 CFR 50.55a(b)(3)(iv), will be fully implemented for check valves in the IST Program at Millstone Unit Nos. 2 and 3.	March 31, 2004