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Nuclear Energy**

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The Northeast Utilities System

DEC 14 2000

Docket No. 50-336
B18289

RE: 10 CFR 50.55a(a)(3)(ii)

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

Millstone Nuclear Power Station, Unit No. 2
Inservice Test Program Request for Relief From ASME Section XI
Revised Relief Request R-1

On June 1, 2000,⁽¹⁾ Northeast Nuclear Energy Company (NNECO) requested relief from inservice testing requirements of 10 CFR 50.55a(f) for certain Class 2 and 3 components in the Millstone Unit No. 2 Inservice Test (IST) Program.⁽²⁾ This letter revises the relief request R-1 for fire water system valves included in the referenced correspondence. The revised relief request R-1 is provided in Attachment 1 with side bars to indicate the areas changed.

The attached relief request was modified to reflect clarification from a discussion with the Nuclear Regulatory Commission (NRC) on December 7, 2000.

There are no regulatory commitments contained within this letter.

⁽¹⁾ NNECO letter to NRC, "Millstone Nuclear Power Station, Unit No. 2, Inservice Test Program, Request for Relief from ASME Section XI," dated June 1, 2000, (B18099).

⁽²⁾ The current Code of Record for the IST Program of Millstone Unit No. 2 is the ASME/ANSI OM-1987 and Addendum OMa-1988. The third ten-year interval began April 1, 1999.

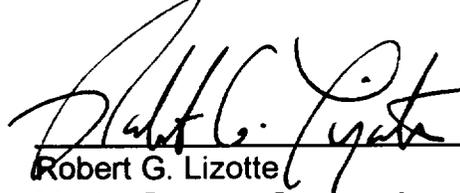
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Should you have any questions regarding this matter, please contact Mr. Ravi G. Joshi at (860) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in black ink, appearing to read "Robert G. Lizotte", is written over a solid horizontal line.

Robert G. Lizotte
Master Process Owner - Assessment

Attachment: Relief Request for Inservice Testing Requirements for Fire Water System Valves (Revision 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

Attachment 1

Millstone Nuclear Power Station, Unit No. 2

**Relief Request for Inservice Testing Requirements for
Fire Water System Valves (Revision 1)**

**Relief Request for Inservice Testing Requirements for
Fire Water System Valves (Revision 1)**

Relief Request No.: R-1 (Revision 1)

System: Fire Water

Valves: Valves 2-FIRE-94A/B/C

Code Class: 3

Category: B

Open Function: Open manually to provide emergency fire water to the Auxiliary Feed Water (AFW) system.

Close Function: Remain closed to isolate Fire Water from the AFW system.

Test Requirement: Full stroke exercise valves during plant operation to the position required to fulfill its function. (OM-10 paragraph 4.2.1.2).

Basis For Relief: The normally closed six inch manually operated gate valves serve as the Fire Water/AFW system boundary valves which tie in directly to each of the three AFW pump suction lines. The normally isolated fire water system provides an alternate source of water to the AFW pumps during long term cooling in the event the normal condensate storage tank (CST) supply is depleted. An eight inch fire water header supplies the three parallel six inch lines, one for each of the three AFW pumps, which tie directly into the normal AFW suction path from the CST. There is no drain path available between the eight inch header and the three six inch isolation valves.

Manual full stroke or part stroke testing each valve during reactor operation, cold shut down, and refueling is not practical since the fire water discharge flow path goes directly to the suction of the AFW and could cause plant equipment damage. Cycling the valves would result in chemical and particulate contamination of the AFW system and/or CST. The AFW suction line spool piping could be removed and the fire water routed away from the AFW system using temporary piping however, this would create a hardship with the significant maintenance preparation and restoration activities, the proper disposal of the chlorinated fire

water, and system flushing required after each valve cycle to insure the AFW system does not become contaminated when restored.

Manual full stroke testing each valve every refueling would be unduly burdensome, creating an unwarranted environmental impact and impacting outage work completion (An AFW pump is required to be available during refueling outages for shutdown risk purposes).

All the valves have been verified capable of performing their safety function with successful testing performed during Refueling Outage 13 (5/2000). A work history review back to 1985 did not identify any component problems.

Alternate Testing:

The following alternate test plan avoids undue hardship and does not compromise component level quality or safety and is adequate to meet the fundamental objective of detecting degradation.

Unit No. 2 proposes testing the fire water valves (2-FIRE-94A/B/C) on a sample frequency of one valve each refuel cycle. A selected valve in the group will be manually full-stroked every refueling outage and all the valves in the group will be manually full-stroked within 3 refueling cycles. If the selected valve being manually full-stroked is not capable of being full-stroke exercised the remaining valves in the group will be manually full-stroke exercised during the same outage.

A full stroke exercise test will be performed in accordance with OM-10 after any maintenance that could affect the full-stroke capability of the valve.

The sample group was selected utilizing a methodology similar to the guidelines established in NUREG 1482 for check valve disassembly groups since they are the same manufacturer, model, size, application, and orientation.