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Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385



Dominion™

NOV 26 2002

Docket No. 50-423
B18796

RE: 10 CFR 50.55a

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

Millstone Power Station Unit No. 3
10 CFR 50.55a Request, IR-2-27, for the Second Ten Year
Interval Section XI Repair & Replacement Program

Pursuant to 10 CFR 50.55a(a)(3)(i), Dominion Nuclear Connecticut, Inc (DNC) hereby requests NRC approval of the following request for an alternative to the ASME Boiler and Pressure Vessel Code, Section XI requirements associated with the Repair & Replacement (R&R) Program which is based on the second 10-year interval Inservice Inspection (ISI) Program at Millstone Unit No. 3, which began on April 23, 1999. DNC is submitting this proposed 10 CFR 50.55a Request, IR-2-27, for the R&R Program.

10 CFR 50.55a Request, IR-2-27, will provide an alternative to the requirements of Section XI to allow the one time use of a Non-ASME Section III N-type certificate holder to perform fabrication activities at its facility while meeting the requirements of 10 CFR 50 Appendix B, Quality Assurance Criteria For Nuclear Power Plants And Fuel Reprocessing Plants.

10 CFR 50.55a Request, IR-2-27, is provided as Attachment 1 of this letter. To assist in the timely review and approval of this request, this submittal has been formatted consistent with the draft NEI white paper for 10 CFR 50.55a requests.⁽¹⁾

DNC requests NRC approval and issuance of this 10 CFR 50.55a request by November 30, 2003.

There are no regulatory commitments contained within this letter.

⁽¹⁾ NEI White Paper, "Standard Format for Requests Regarding the Use of Alternatives to, or Relief from, 10 CFR 50.55a ASME Code Requirements for Commercial Reactor Licensees," dated June 6, 2002

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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,

DOMINION NUCLEAR CONNECTICUT, INC.



J. Alan Price
Site Vice President - Millstone

Attachment (1): 10 CFR 50.55a Request, IR-2-27

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

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Attachment 1

Millstone Power Station, Unit No. 3

10 CFR 50.55a Request, IR-2-27

Attachment 1
10 CFR 50.55a Request, IR-2-27

1. ASME Code Component(s) Affected

The replacement activity associated with this request was completed on May 3, 1999, and attested to by the issuance of a Certificate of Conformance by the vendor with an Authorized Nuclear Inspector's (ANI) involvement that is applicable to the piping subassemblies fabricated at the vendor's facility for the Millstone Unit No. 3 "A" and "D" Trains of the Feedwater System. The shop fabrication included application of ID stainless steel cladding using ER309L filler material to 18", 16", and 8" SA-106 Gr.C Sch 100 piping, with two 16" x 18" SA-234 Gr. WPC Sch 100 reducers, and the following shop welds:

"A" Train					
Vendor Weld Number	Construction NDE	ISI Weld Number	ISI Item No. / Category	Section XI PSI NDE	Description
FW72	RT, PT	FWS-11-FW-72	C5.81 / C-F-2	RT, PT	Pressure Retaining 18" Pipe To Reducer Butt Weld
FW82	MT	N/A	N/A	N/A	Non-Pressure Retaining Reinforcement Plate Full Penetration Weld
FW83	RT Repair Welded	FWS-11-FW-83	C5.81 / C-F-2	Construction RT Used. Inaccessible After Welding Reinforcement Plate.	8" To 18" Pipe Stab-In Partial Penetration Weld. Original Design.
FW84	MT	N/A	N/A	N/A	Non- Pressure Retaining Reinforcement Plate Full Penetration Weld.
FW85	MT	FWS-11-FW-85	C3 20 / C-C	MT	Reinforcement Plate Fillet Weld Attachment
FW86	MT	FWS-11-FW-86	C5.20 / C-C	MT	8" To 18" Partial Penetration Plate Weld/Fillet Attachment

"D" Train					
Vendor Weld Number	Construction NDE	ISI Weld Number	ISI Item No. / Category	Section XI PSI NDE	Description
FW67	RT, PT Repair Welded	FWS-17-FW-67	C5.81 / C-F-2	RT, PT	Pressure Retaining 18" Pipe To Reducer Butt Weld.
FW76	MT	N/N	N/A	N/A	Non- Pressure Retaining Reinforcement Plate Full Penetration Weld
FW77	RT	FWS-17-FW-77	C5 81 / C-F-2	Construction RT Used. Inaccessible After Welding Reinforcement Plate.	8" To 18" Pipe Stab-In Partial Penetration Weld. Original Design
FW78	MT	N/A	N/A	N/A	Non- Pressure Retaining Reinforcement Plate Full Penetration Weld.
FW79	MT	FWS-17-FW-79	C3 20 / C-C	MT	Reinforcement Plate Fillet Weld Attachment.
FW80	MT	FWS-17-FW-80	C3.20 / C-C	MT	8" To 18" Partial Penetration Plate Weld/Fillet Attachment

All of the applied cladding had a penetrant dye test performed, and the subassemblies were pressure tested following installation.

2. Applicable Code Edition and Addenda

The Millstone Unit No. 3 R&R Program complies with the ASME Code Section XI, 1989 Edition. The Construction Code for the replacements described above is the ASME Section III, NC, 1971 Edition with the Summer 1973 Addenda. In order to meet the requirements for alternative pressure testing allowed for and approved by the Staff in Code Case N-416-1, Construction Code NDE methods and acceptance criteria as applicable were either reconciled to meet or met the requirements of the ASME Section III, 1992 Edition.

3. Applicable Code Requirement

When performing replacements in accordance with the ASME Section XI, 1989 Edition, IWA-7210(b) requires that items to be used for replacement meet the Construction Code and the existing design requirements. If the original Construction Code was Section III, then all the requirements of Section III apply unless they are modified or exempted by the other provisions of IWA-7000. Because of this, Section XI requirement the general requirements for quality assurance and documentation of the Section III, Subsection NA, and Class 2 requirements of Subsection NC that are applicable to this request shall be met. When a piping subassembly is fabricated by a vendor at that vendor's facility to meet Section III requirements, an ASME N-type certificate of authorization is required to be used with at least a NPT stamp and all of the quality assurance provisions that are associated with the vendor's authorization shall be applied. When all these requirements have been met, an applicable Code Data Report would be issued by the fabricator and signed by an ANI.

4. Proposed Alternative

DNC proposes as an alternative to the requirements of the ASME Section XI, 1989 Edition, IWA-7210(b), and the ASME Section III, 1971 Edition, with the Summer 1973 Addenda that require a vendor to have an ASME N-type certificate of authorization (NPT-type), and provide with a completed subassembly a Code Data Report Form NPP, that the provisions of 10 CFR 50 Appendix B be used along with participation of an ANI. The application of the 10 CFR 50 Appendix B criteria proposed in this alternative is specific to the Millstone Unit No. 3 Section XI R&R Program regarding the vendor portion (i.e., subassembly fabrication) for the replacement activity described in this request.

5. Basis of Alternative for Providing Acceptable Level of Quality and Safety

The original Section XI R&R activity described in this request took place during Refueling Outage 6 in the spring of 1999 and was intended to be performed solely at the Millstone Site with the vendor working under the Millstone Section XI R&R Program and 10 CFR 50 Appendix B. If this had been the case, no issue would exist as Millstone Unit No. 3 would have been in full compliance with Section XI, but during the outage it was decided that schedule enhancements would result if the vendor could fabricate the piping subassemblies at their facility. A change in the purchase order, made to allow this work, did not identify that the vendor needed to have an ASME Section III, N-type certificate of authorization to perform the work at their facility.

In support of the alternative provided in this request, the following documentation has been generated under this replacement activity. DNC would expect that similar documentation would be used to support the vendor subassembly fabrication under Section III requirements if a Code Data Report Form NPP had been issued along with any pertinent notes.

- (a) Welding Procedures
- (b) Welding Procedure Qualifications
- (c) Heat Treatment/Bending/Cleaning Procedures - Covered By Weld Procedures
- (d) NDE Procedures
- (e) NDE Reports
- (f) Radiographic Records and Film
- (g) Material Certifications (Including Filler Metal)
- (h) Control Isometrics
- (i) Pipe Weld Data Sheets
- (j) Nonconformance Reports and Dispositions - No Nonconformance Reports were issued. However, several welds were repaired during fabrication. Repair weld and acceptance documentation is provided in the Vendors Data Package for Fabrication.
- (k) Third Party ANI Inspection - Evidence of ANI involvement is provided on the Vendor Quality Assurance Travelers for the subassemblies.
- (l) Pressure Testing Reports - Part of the Millstone installation work documentation.

Based on the above information DNC concludes that the granting of this proposed alternative would provide an acceptable level of quality and safety, and would not adversely impact the health and safety of the public.

6. Duration of Proposed Alternative

This is a one time alternative to be applied for the life of the replacement.