



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NRC PDR

May 11, 1979

Docket No. 50-336

Mr. W. G. Council, Vice President
Nuclear Engineering & Operations
Northeast Nuclear Energy Company
P. O. Box 270
Hartford, Connecticut 06101

Dear Mr. Council:

As previously discussed with your staff, representatives of the Nuclear Regulatory Commission will meet with your representatives at Millstone Nuclear Power Station on May 23 and 24, 1979. The purpose of the meeting is to discuss the enclosed comments and questions on the Inservice Testing (IST) Program for Millstone Unit No. 2.

The NRC representatives that will attend the meeting are:

V. Nerses - NRC
A. Wang - NRC
J. Fehringer - EGG
H. Rockhold - EGG

We request that your staff be prepared to discuss the enclosure at the meeting and document the answers in a formal submittal by June 25, 1979. Please contact me if you require any further information on this meeting.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert W. Reid".

Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Enclosure:
IST Comments and Questions

cc w/enclosure:
See next page

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Questions and Comments
Millstone Nuclear Power Station Unit No. 2
Inservice Testing Program

The following are comments and questions on the in-service testing submittals by NNECO. These comments and questions are directed at Millstone Unit 2 and are preparatory to a future working meeting to be arranged with the licensee.

I. PUMP TESTING PROGRAM

A. Service Water System Chemical and Volume Control System

1. Specific relief will be required for not measuring service water pumps and charging pumps inlet pressures. Provide the specific technical basis used to support the determination that measuring inlet pressure is impractical.

B. All Safety Related Pumps

1. Provide more detailed technical information to support the determination that measuring bearing temperature for each safety related pump is impractical.
2. Vibration measurement limits, Alert and Required Action Ranges must be specifically identified for each safety related pump and incorporated into the IST submittal.

II. VALVE TESTING PROGRAM

A. General

1. Provide a list of all valves that require a check of valve position indicators per IWV-3300.
2. Provide a list of all power operated valve stroke time limits required by IWV-3410(C)(1).

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B. Safety Injection (SI) System, Containment Spray (CS) System

1. Provide a procedural description of how the following valves are full stroke exercised.

SI-008
SI-009
SI-010
SI-011
SI-012
SI-113
SI-123
SI-133
SI-143
SI-405
SI-414
SI-427
SI-215
SI-225
SI-235
SI-245
SI-217
SI-227
SI-237
SI-247
SI-401
SI-410
SI-706A, B, C, and D
CS-14A and 14B
CS-15A and 15B

2. Specific relief was requested from exercising valves SI-434 and SI-446 during power operation. Provide more specific information on how opening valve SI-657 renders the LPI system inoperative.
3. Review the safety related function of the following valves to determine if they should be Categorized B instead of A/B.

SI-615, 625, 635 and 645
SI-618, 628, 638 and 648
4. What specific technical basis was used to make the determination that valves SI-659 and SI-660 cannot be exercised during power operation?
5. Review the safety related function of containment isolation valve SI-312 and SI-080 to determine if they should be Categorized A.
6. What specific technical basis was used to make the determination that valves CS-2A, 2B, 5A, and 5B cannot be exercised during power operation or cold shutdowns?

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7. The MRC staff considers the following valves safety related, and therefore they should be included in the IST program and categorized as indicated.

Category B

SI-611
SI-621
SI-631
SI-641
SI-662
SI-663

Category A

SI-463

- B. Are any of the SI or CS pumps suction or discharge manual isolations locked in position?

C. Chemical and Volume Control (CH) System

1. Review the safety related function of containment isolation valve CH-089 and CH-516 to determine if they should be Categorized A? Provide a more detailed technical basis as to why this valve cannot be exercised during power operation.
2. Provide a procedural description of how the following valves are full stroke exercised.

CH-177
CH-190

3. Valve CH-429 should be Categorized E not B/E.
4. Provide a more detailed basis concerning the problems associated with shutting valve CH-501 during power operation.
5. Provide a more detailed basis concerning the problems associated with shutting valves CH-515 and CH-516 during power operation.
6. Review the safety related function of the following valves and determine whether they should be included in the IST program and categorized as indicated.

Category E

CH-434
CH-322
CH-319
CH-316
CH-136
CH-137
CH-339
CH-338
CH-142

Category C

CH-434

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Category E

- CH-143
- CH-152
- CH-131
- CH-145
- CH-153

D. Feedwater (FW) System

1. Provide a more detailed explanation of the problems associated with exercising valves FW-5A and 5B during power operation.
2. Review the safety related function of FW-56A and 56B to determine if they should be included in the IST program (i.e., Do these valves have a safety function?)
3. The NRC staff considers the following valves safety related, and therefore should be included in the IST program and Categorized E.

CN-25, 26, 27A, 27B, 29A, 29B, and 30
 FW-9A, 9B, 9C, 10A, 10B, 11A, and 11P

E. Reactor Coolant (RC) System

1. Review the safety related function of the following containment isolation valves to determine if they should be categorized as indicated.

Category A

RC-001, 002, 003
 PMW-43

Category A/C

PMW-3

F. Service Water (SW) System

1. What would be the consequences if valves SW-3.2A or 3.2B failed shut while testing during power operation?
2. The NRC staff considers valves SW-3.1A and 3.1B safety related and therefore should be included in the IST program and Categorized B.

G. Reactor Building Closed Cooling Water (RB) System

1. The NRC staff considers containment isolation valves RB-30.1A and 30.1B safety related and therefore should be included in the IST program and Categorized A.
2. Are the containment air recirculation and cooling units required for post accident operations?

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3. The NRC staff considers valves RB-211A through F and RB-4.1A through F safety related and therefore should be included in the IST program and Categorized B.
4. Are there any containment penetrations associated with the seal coolers?
5. What is the safety related function of valve RB-210?

H. Main Steam (MS) System

1. What is the safety related function of valves MS-265B and 266B?

I. Chilled Water (CHW) System

1. The NRC staff considers valves CHW-4 and 34 Category B safety related and therefore should be exercised to their safety related position. (i.e. provide full flow to the chiller and DC room switch gear A/C unit)

J. Containment Isolation Valves

1. All valves identified below are containment isolation valves and should be Categorized A.

AC-12, 15, 20 and 47
EB-88 and 89
CH-506 and 198
GR-11.1 and 11.2