

Northeast  
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
(203) 665-5000

March 4, 1994

Jocket No. 50-245  
B14774

Re: 10CFR50.55a(a)(3)(i)

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

Millstone Nuclear Power Station, Unit No. 1  
Request to Use an Alternative to ASME Code Section XI

During the first week of February 1994, Northeast Nuclear Energy Company (NNECO) identified six indications in various austenitic stainless steel piping systems. These indications were identified during the current cycle 14 refueling outage Inservice Inspection (ISI) activities which we performed in accordance with our response to Generic Letter (GL) 88-01.<sup>(1)</sup> Five of the welds with indications are scheduled to be repaired during the current refueling outage utilizing weld reinforcement (weld overlay). The sixth weld will be replaced with piping utilizing inside diameter corrosion resistant cladding. The purpose of this letter is to request the use of an alternative to the ASME Boiler and Pressure Vessel Code, Section XI, requirements pursuant to 10CFR50.55a(a)(3)(i) for the five weld overlay repairs.

Specifically, NNECO requests approval to use the provisions of Code Case N-504 entitled "Alternative Rules for Repair of Class 1, 2, and 3 Austenitic Stainless Steel Piping, Section XI, Division 1," to establish the acceptability for five of the six welds by increasing the pipe wall thickness by deposition of weld reinforcement material on the outside surface of the piping. In performing these repairs, NNECO will not be taking any exceptions to Code Case N-504. The subject welds to be overlaid are located in the Low Pressure Coolant Injection system, the Isolation Condenser system, and the Reactor Recirculation system. Following weld overlay repair of the indications, pressure testing and preservice examinations also will be performed in accordance with Code Case N-504. The sixth weld is located within the Reactor Water Cleanup system (RWCU). The RWCU weld repair is being effected through pipe replacement.

(1) E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Response to Generic Letter 88-01--IGSCC in Austenitic Stainless Steel Piping," dated July 27, 1988.

APR 11 1994

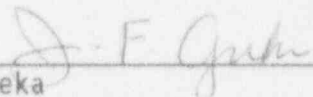
U.S. Nuclear Regulatory Commission  
B14774/Page 2  
March 4, 1994

NNECO has determined that this alternative provides an acceptable level of quality and safety for the subject piping. Concurrence with utilization of Code Case N-504 is requested prior to the start of cycle 15, currently scheduled for April 1, 1994.

Please contact us if you have any questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
\_\_\_\_\_  
J. F. Opeka  
Executive Vice President

cc: T. T. Martin, Region I Administrator  
J. W. Andersen, NRC Acting Project Manager, Millstone Unit No. 1  
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,  
and 3