

**BOSTON EDISON COMPANY**  
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November 15, 1982

BECO. Ltr. #82-296

Mr. Domenic B. Vassallo, Chief  
Operating Reactors Branch #2  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

License No. DPR-35  
Docket No. 50-293

ISI Relief Requests

Ref. (a): Telephone Conference, dated  
10/20/82, with BECO and NRC  
to Discuss ISI

Dear Sir:

Boston Edison's answers to your request for further information regarding Code Relief Request #7 and #10 are presented below. These answers were verbally transmitted to the members of your staff involved in the review of this subject via the Reference (a) telephone conference.

Question 1

In regards to visual examination of internal pressure boundary surfaces of valves (Relief Request #7) provide a list of the valve categories for which at least one valve has had this examination during maintenance. What unsatisfactory results, if any, were observed? Provide any other information that shows whether the examined valves are a reasonable sample of primary system valves. Provide a specific relief request for each valve category for which such an examination has not been made. List and discuss extenuating circumstances such as high radiation level, necessity to drain reactor vessel, etc., in each instance.

Response

Boston Edison has identified 56 valves which are divided into twenty specific categories (see attachment). Maintenance requests dating back to 1971 were reviewed to develop a case history for each valve. The results of this review are as follows:

- 1.) Valves in six categories (3, 7, 9, 13, 19, 20) have been disassembled for maintenance and the internal surfaces have been visually examined.

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- 2.) Valves in nine categories (1, 4, 5, 8, 10, 12, 14, 16, 18) are included in the Local Break Rate Test (LLRT) Program. If a valve in any of these categories failed the LLRT and required disassembly, the internal surfaces of these valves would be visually examined.
- 3.) Disassembly of valves in Category 2 (suction and discharge valves) requires that the core be unloaded and that the water level be lowered below the core support structure.
- 4.) Disassembly of valves in Categories 6 and 17 would involve high radiation exposure ( $\geq 1.5$  Rem) to personnel and are located in a limited access area. The valves in question are:
  - a.) RWCU - 1201-81 (Category 6)
  - b.) RHR testable check valves - 1001-68A, 68B (Category 17)
- 5.) The remaining two valve categories (11, 15), which are comprised of three check valves, will have one valve from each group disassembled for visual examination, once each inspection interval. The valves in question are:
  - a.) RHR 1001-64 (head spray valve) Category 11
  - b.) RCIC 1301-50 (pump discharge valve) Category 15
  - c.) HPCI 2301-7 (pump discharge valve) Category 15

Question 2

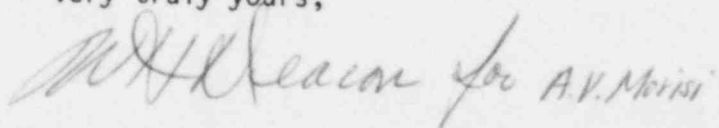
In regards to pump casing welds (licensee's Relief Request #10) has consideration been given to the MINAC technique developed by EPRI? Is it practical for this application? Would it require disassembly of the pump? If so, could the inspection of the internal pressure boundary surface (Relief Request #8) be done at the same time?

Response

Boston Edison is withdrawing its request for code relief regarding the visual inspection of (pressure retaining) welds in pump casings. The basis for this withdrawal request is the result of a reevaluation of the reference weld and the subsequent determination that this weld can be classified as a non pressure retaining weld.

We feel this information adequately answers your questions. Should you require any additional information, please contact us.

Very truly yours,

  
A.V. Morisi

ASME SECTION XI VALVE CAT. B-M2  
(1974 EDITION)

GROUP	MANUFACTURER	TYPE	SIZE	SYSTEM	DESIGNATION
1	VELAN (N14 & N14M4)	GATE	4"	RHR (HEAD SPRAY)	1001-60
			10"	HPCI	2301-4
					2301-5
2	DARLING (21 A1 342)	GATE	22"	RECIRCULATION	202-6A
					202-6B
			28"	RECIRCULATION	202-4A
					202-4B
					202-5A
					202-5B
3	ATWOOD & MORRILL (M-1)	GLOBE	20"	MAIN STEAM	203-1A
					203-2A
					203-1B
					203-2B

ASME SECTION XI VALVE CAT. B-M2  
(1974 EDITION)

GROUP	MANUFACTURER	TYPE	SIZE	SYSTEM	DESIGNATION
3 (continued)	ATWOOD & MORRILL (M-1)	GLOBE	20"	MAIN STEAM	203-1C
					203-2C
					203-1D
					203-2D
4	WALWORTH (N10M4)	GATE	6"	RWCU (in)	1201-82
			18"	FEEDWATER	57-A
					57-B
5	WALWORTH (N14M4)	GATE	20"	RHR	1001-47
6	WALWORTH (N216M4)	CHECK	6"	RWCU (in)	1201-81
7	WALWORTH (N14M3)	GATE	4"	RHR (HEAD SPRAY)	1001-63
			6"	RWCU (out)	1201-5
					1201-85
					1201-2

(1974 EDITION)

GROUP	MANUFACTURER	TYPE	SIZE	SYSTEM	DESIGNATION
7 (continued)	WALWORTH (N14M3)	GATE	10"	CORE SPRAY	1400-25A
					1400-25B
8	WALWORTH (N14M3)	GATE	10"	CORE SPRAY	1400-6A
					1400-6B
9	WALWORTH (N14M3)	GATE	18"	RHR	1001-33A
					1001-29A
			20"		1001-33B
					1001-29B
1001-50					
10	WALWORTH (N14M3)	GATE	20"	RHR	1001-51
11	WALWORTH (N219M3)	CHECK	4"	RHR	1001-64
12	WALWORTH (N116M3)	GLOBE	4"	RWCU	1201-80
13	ANCHOR (N214M4)	CHECK	18"	FEEDWATER	58-A
					58-B
					62-A

ASME SECTION XI VALVE CAT. B-M2  
(1974 EDITION)

GROUP	MANUFACTURER	TYPE	SIZE	SYSTEM	DESIGNATION
20	CROSBY	SAFETY VALVES	6"	MAIN STEAM	203-4A
					203-4B

## ASME SECTION XI VALVE CAT. B-M2

(1974 EDITION)

GROUP	MANUFACTURER	TYPE	SIZE	SYSTEM	DESIGNATION
13 (continued)	ANCHOR (N214M4)	CHECK	18"	FEEDWATER	62-B
14	ANCHOR (N10)	GATE	14"	HPCI	2301-8
15	ROCKWELL (N277M4)	CHECK	4"	RCIC	1301-50
			14"	HPCI	2301-7
16	ROCKWELL (N277SP)	TESTABLE CHECK	10"	CORE SPRAY	1400-9A
					1400-9B
17	ROCKWELL (N277SPM3)	TESTABLE CHECK	18"	RHR	1001-68A
					1001-68B
18	POWELL (N10)	GATE	4"	RCIC (1n)	1301-49
19	TARGET ROCK	RELIEF VALVES	6"	MAIN STEAM	203-3A
					203-3B
					203-3C
					203-3D

ASME SECTION XI VALVE CAT. B-M2  
(1974 EDITION)

GROUP	MANUFACTURER	TYPE	SIZE	SYSTEM	DESIGNATION
20	CROSBY	SAFETY VALVES	6"	MAIN STEAM	203-4A 203-4B