

Northeast  
Utilities System

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December 16, 1994

Docket No. 50-336

B15071

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

Millstone Nuclear Power Station, Unit No. 2  
Request to Use an Alternative to ASME Code Section XI

The purpose of this letter is for Northeast Nuclear Energy Company (NNECO) to request the use of an alternative to the ASME Boiler and Pressure Vessel Code, Section XI, 1980 edition through winter 1981 addendum for Millstone Unit No. 2 pursuant to the provisions of 10CFR50.55a(a)(3). Specifically, NNECO requests approval to use the provisions of Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems, Section XI, Division 1." NNECO's letter of September 22, 1994<sup>(1)</sup> previously requested use of this same code case. This request was not authorized by the NRC Staff<sup>(2)</sup> due to the ongoing Staff review of this code case.

Since the NRC Staff's October 25, 1994, letter, Code Case N-498-1 technical review has been completed and judged acceptable by the Staff. Therefore, NNECO wishes to request the use of Code Case N-498-1 for Millstone Unit No. 2.

During the current Millstone Unit No. 2 refuel outage, NNECO is scheduled to perform several 10-Year system hydrostatic tests. The performance of these hydrostatic tests, as currently required by the Millstone Unit No. 2 code of record, would result in a substantial hardship to the plant in the form of additional expenditures of funds to perform these tests and additional radiation exposure to the individuals involved in the tests without

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(1) J. F. Opeka letter to the U.S. Nuclear Regulatory Commission, "Request to Use an Alternative to ASME Code Section XI," dated September 22, 1994.

(2) P. F. McKee letter to J. F. Opeka, "Request to Use Alternatives to ASME Code Section XI (TAC No. M90446)," dated October 25, 1994.

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realizing a commensurate gain in safety. The issuance of this code case revision by the ASME, with NRC acceptance, provides the basis for the approval of the alternative which has been determined by the ASME consensus process to provide an acceptable level of quality and safety.

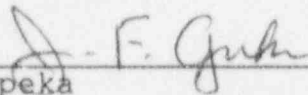
NNECO is aware that the NRC has completed its review of Code Case N-498-1 and will be incorporating it, whenever possible, into Regulatory Guide 1.147. Currently, NNECO is in a refuel outage and wishes to invoke this code case. Therefore, approval to use this code case is requested by January 6, 1995.

This submittal is considered a Cost Beneficial Licensing Action by NNECO. Elimination of these activities is anticipated to save more than the \$100,000 guideline identified by the Staff and performance of these tests would not provide a significant or commensurate benefit to public health and safety.

If you should have any questions on this, please contact Mr. W. E. Hutchins at (203) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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J. F. Opeka  
Executive Vice President

cc: T. T. Martin, Region I Administrator  
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2  
P. D. Swetland, Senior Resident Inspector, Millstone Unit  
Nos. 1, 2, and 3