



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

Docket
File

February 20, 1992

Docket No. 50-336

Mr. John F. Opeka
Executive Vice President, Nuclear
Connecticut Yankee Atomic Power Company
Northeast Nuclear Energy Company
Post Office Box 270
Hartford, Connecticut 06141-0270

Dear Mr. Opeka:

SUBJECT: ACCEPTABILITY GUIDELINES CONCERNING SEISMIC EVALUATIONS
FOR MAINTENANCE WORK - MILLSTONE 2 (TAC NO. M76687)

In your letter dated March 27, 1990, you submitted a license amendment request that would have added requirements to the Millstone Unit 2 Technical Specifications concerning seismic restraints, other than snubbers, and seismic qualifications of safety-related piping systems. Specifically, the proposed changes would have added Sections 3/4.7.11 and 3/4.7.12 and their applicable Bases to the technical specifications. These sections would have explicitly defined the mechanical/structural aspects of seismic qualification requirements for Millstone Unit 2 piping systems and provided the actions to be taken in the event that:

- (1) A seismic restraint(s), other than a snubber is found or rendered inoperable (Section 3/4.7.11).
- (2) The seismic qualification of a safety-related piping system, component, or equipment is temporarily affected for a very short duration as a result of structural decoupling or an inoperable/inadequate component other than a seismic restraint or snubber (Section 3/4.7.12)

We reviewed your request and determined that such Technical Specification requirements were not necessary since we believe that sufficient guidance has previously been given to licensees regarding seismic acceptability of safety-related systems and equipment. In discussions between your staff and the NRC staff, the NRC staff recommended that you review the guidance provided by NRC Bulletins 79-02, Revisions 9, 1, & 2 and Supplement 1 to Revision 1, 79-14, Revisions 0 & 1 and Supplements 1 & 2 to Revision 1 and submit your interpretation of the applicability of these guidelines to the NRC for review.

By letter dated August 6, 1991, you submitted a revised version of the acceptability guidelines concerning seismic evaluations for preplanned and

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unplanned maintenance work. You indicated that such guidance would be incorporated into plant procedures for conducting maintenance activities upon review and acceptance by the NRC.

We have reviewed your guidelines as submitted in your letter dated August 6, 1991, and have determined that they are representative of current industry practices and are consistent with the Bulletin 79-02 and 79-14 guidance. Additional information and guidance on resolution of degraded and nonconforming conditions and operability determinations has been provided in Generic Letter (GL) 91-18 dated November 4, 1991. The purpose of publishing this guidance was to ensure consistency in application of the guidance by the NRC. Regional inspection personnel have been briefed on the guidance. You should consult with the Regional office regarding the application of specific staff positions in the guidance.

We have discussed the above with your staff. It was agreed that it was the intention of your staff to withdraw the amendment request of March 27, 1990, upon the NRC acceptance of your guidance submitted in your letter of August 6, 1991. In accordance with our telephone conversations with your staff, we will consider the amendment request withdrawn, we will not issue a corresponding amendment to the Millstone 2 Technical Specifications, and we will consider this issue closed.

Sincerely,

/s/

Guy S. Vissing, Senior Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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