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August 7, 1992

Docket No. 50-336 B14212

Re: IS! Program

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2 Revised 10-Year In-Service Inspection Program Relief Request and Intention to Perform Reactor Coolant Pump Alternate Examination

In a letter dated June 27, 1985, (1) Northeast Nuclear Energy Company (NNECO), on behalf of Millstone Unit No. 2, submitted the second interval In-Service Inspection (ISI) Program for Millstone Unit No. 2. Included in the submittal was Relief Request RR-2 which requested relief from the code-required volumetric exam and proposed alternative exams of the external weld surface and the accessible internal surfaces of the reactor coolant pumps (RCP).

In a letter dated April 17, 1989, (2) the NRC approved the second 10-year ISI Program and approved a modified version of the relief request. The Safety Evaluation Report required a visual and volumetric exam of the accessible weld region in the RCP is disassembled for raintenance or a state-of-the-art volumetric examination from the external surfaces if the pump is not disassembled. The Staff also required NNECO to perform a surface exam of the welds, perform the code-required visual exam during pressure tests, and notify the Staff of the volumetric technique and procedures 3 months prior to the examination.

In April 1992, the NRC issued Revision 9 of Regulatory Guide 1.147 which endorsed and accepted the use of ASME Code Case N481 with no Staff

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<sup>(1)</sup> J. F. Opeka letter to the Director of Nuclear Reactor Regulation, "Millstone Nuclear Power Station, Unit No. 2, Inservice Inspection and Testing Program," dated June 27, 1985.

<sup>(2)</sup> J. F. Stolz letter to E. J. Mroczka, "Second Ten-Year Inservice Inspection Program and the Granting of Relief From Examinations Requirements Determined to Be Impractical for Millstone, Unit No. 2 (TAC No. 59265)," dated April 17, 1989.

U.S. Nuclear Regulatory Commission B14212/Page 2 August 7, 1392

imitations. The purpose of this letter is to notify the Staff of NNECO's intention to utilize ASME Code Case N481 for the inspection of RCP casings at Millstone Unit No. 2.

Currently, Millstone Unit No. 2 is in a refueling outage and evaluating the disassembly and replacement of a reactor coolant pump rotating assembly. Based upon the above, NNECO desires to withdraw Relief Request RR-2 and intends to impose Code Case 1481 to meet the examination requirements.

NNECO plans to perform a comprehensive visual examination of the RCP casing utilizing state-of-the-art technology. A visual examination (VT-1) of the external surfaces of the welds on one pump will be performed this outage. We also plan to perform a visual examination (VT-3) of the internal accessible surfaces, as required in N481(c) and IWB 2500-1 B 12.20, using remote visual equipment from the inside pore if the pump rotor is removed. A visual examination (VT-2) of the exterior of all pumps (with the insulation installed) will be performed during the hydrostatic test in accordance with the requirements of Table IWB-2500-1, Category B-P, at the end of the current outage.

Additionally, an ergineering evaluation to demonstrate the safety and serviceability of the pump casing in accordance with Requirement "d" of Code Case N481 will be performed. The evaluation will be performed at the completion of the current cutage and will be submitted to the Staff by July 31, 1993.

Since this issue involves significant resources and personnel radiation exposure, we appreciate your timely consideration. Please contact my Staff if you have any questions.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka

Executive Vice President

BY:

President and Chief Operating Officer

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