

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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February 1, 1985

Docket No. 50-423
B11438

Dr. Thomas E. Murley
Regional Administrator
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

- References: (1) W. G. Council letter to T. E. Murley, Reporting of Potential Significant Deficiencies in Design and Construction: Tubeco Weld Radiographs (SD-56), dated January 31, 1985.
- (2) E. C. Wenzinger letter to W. G. Council, IE Inspection Report 50-423/84-20, dated December 21, 1984.

Dear Dr. Murley:

Millstone Nuclear Power Station, Unit No. 3
Tubeco Weld Radiographs

Northeast Nuclear Energy Company (NNECO) has completed a 100% review of weld radiographs supplied by Tubeco. The results of our review are presented in Reference (1).

The following two conditions were identified to be in noncompliance with the ASME code edition used on Millstone Unit No. 3 (1971 Edition, Summer of 1973 Addenda) and were identified as an open item in Reference (2).

<u>Condition</u>	<u>Code Paragraph, '84 Addenda</u>
I. Density of weld exceeds the penetrameter density by more than 30%.	ASME III NCA 1140F ASME V T-263.3(b)
II. Penetrameter located in the area of interest (lead numbers do not obscure weld).	ASME III NCA 1140F ASME V T-263.1.3

Radiographs with the above conditions may be accepted under the 1983 edition of the ASME Code, Summer of 1984 Addenda. Since this edition of the Code has not been formally approved by the NRC and subsequently referenced in 10 CFR 50.55a, NNECO hereby requests Staff approval for use of the appropriate Code paragraphs in this specific case.

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In condition I, the later code recognizes that a density difference greater than 30% may occur due to the use of shims. The resulting radiograph is acceptable provided that code sensitivity requirements are satisfied. Our review has determined that code requirements with respect to sensitivity have been met and, therefore, would be acceptable under the later code.

In condition II, the penetrameter image appears in the area of interest (weld) in lieu of adjacent to the area of interest (basemetal). This condition is acceptable under the later code provided that the lead identification numbers do not obscure any part of the weld. NNECO has determined this to be the case for the majority of the Tubeco radiographs. Exceptions to this criterion will be re-radiographed.

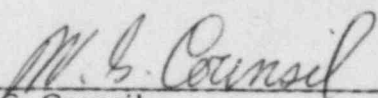
Radiographs which meet the above criteria can be interpreted; thereby verifying weld quality and structural integrity. It is for this reason that we believe that use of the 1983 edition of the ASME code, Summer of 1984 Addenda is a reasonable and appropriate approach to resolution of the above-mentioned conditions.

Adequate resolution of this issue is currently impacting on-going work and turnover on several systems. We therefore request that expeditious consideration be given to our method of resolution.

If you have any questions regarding this submittal, please feel free to contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



W. G. Council
Senior Vice President

cc: Mr. B. J. Youngblood, Director
NRC Division of Licensing

Mr. R. J. Bosnak, Chief
NRC Mechanical Engineering Branch

Mr. B. D. Liaw, Chief
NRC Materials Engineering Branch