

# 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 22, 1985

Docket No. 50-336

B11461

Director of Nuclear Reactor Regulation  
Attn: Mr. James R. Miller  
Operating Reactors Branch #3  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
Use of ASME Code Case N-416 Alternate Rules for Hydrostatic Tests

Pursuant to 10 CFR 50.55a(a)(2)(ii), Northeast Nuclear Energy Company (NNECO) hereby requests authorization for the use of ASME Code Case N-416 "Alternate Rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping to ASME Section XI, Division 1" at Millstone Nuclear Power Station, Unit No. 2. This code case was approved by the ASME on December 5, 1984.

ASME Code Case N-416 allows deferral of hydrostatic tests for certain repairs or replacements until the next regularly scheduled system hydrostatic test. This code case is particularly valuable to NNECO regarding replacement of the steam generator wet layup valves (2-MS-432 A and B) at Millstone Unit No. 2, an activity planned for the current refueling outage.

There are no isolation valves between the steam generator and the wet layup valves, thus, hydrostatically testing the welds of the valves involves gagging the main steam safety valves, filling the steam generator up to the main steam isolation valves and then pressurizing the entire secondary side of the steam generator.

Due to the fatigue stresses caused by hydrotesting, the Millstone Unit No. 2 steam generators are limited to only ten lifetime hydrotests. Two such hydrotests have been performed to date and the Ten Year Inservice Inspection Programs require a total of four steam generator hydrotests (one per ten year interval). Thus, it is prudent to limit the number of steam generator hydrotests.

More importantly, weld integrity of the installed wet layup valves would be ensured by the conditions outlined in Code Case N-416, that is, an inservice leak test and surface examination. Therefore, this request is justified since integrity of the replacement valves will be assured without conducting the involved steam generator hydrotests.

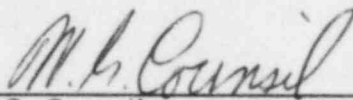
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As the Cycle 7 refueling outage for Millstone Unit No. 2 commenced on February 16, 1985, we request a response to this letter by March 14, 1985. My staff is available to assist you in any way in your review of this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
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W. G. Council  
Senior Vice President