

December 7, 1984

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Docket No. 50-336

Mr. W. G. Council, Senior Vice President
Nuclear Engineering & Operations
Northeast Nuclear Energy Company
P. O. Box 270
Hartford, Connecticut 06141

Dear Mr. Council:

SUBJECT: INSERVICE TESTING REQUIREMENTS FOR MILLSTONE UNIT 2

By letter dated March 12, 1984 you requested relief from the ASME code requirements of full-stroke testing of the four Safety Injection Tank outlet check valves. As discussed in a conference call of November 14, 1984, the NRC staff position is that relief will not be granted from the full stroke test requirement. Consequently, we will require that you provide justification that the flow rate achieved in the test (e.g., 4000 GPM, 16 ft per sec) either meets the design requirements of the valves or that this flow rate represents a fully open valve.

Additional discussion during the conference call concerned your letter dated May 4, 1984 which concluded that the auxiliary fluid systems of the emergency diesel are not included under Section XI of the ASME code, so consequently the pumps and valves within these system do not have to meet Section XI inservice testing requirements. As discussed, the NRC staff position is that Reg. Guide 1.26 does include these systems with further clarification provided by Standard Review Plan 3.2.2. Thus, Section XI is applicable to these pumps and valves and further explanation will be required from you to show how inservice testing of pumps and valves in accordance with Section XI requirements are met. Additional information as requested on page 25 of our Safety Evaluation contained in our May 4, 1983 letter will also be required (i.e., identification of pumps and valves in the system, feasibility study addressing Section XI inservice testing requirements for conducting meaningful tests, and an appropriate amendment to the Inservice Testing Program). The staff does not consider Section XI inservice testing code requirements to be superfluous and will require adherence to the Code. One of the main purposes of Section XI is to detect degradation of a component prior to the actual breakdown. This is accomplished by rigorous testing beyond that required by the Technical Specifications.

Mr. W. G. Council

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Examples of Section XI inservice testing requirements that are not included under the Technical Specification and which should be addressed in your feasibility study include testing of redundant sub-systems, rigorous leak testing of valves, rigorous pump design flow testing, vibrational measurements, measurements of stroke time for power operated valves, and analyzing test data under a stringent time frame.

The staff is available to discuss these requirements in more detail if desired. We request that you provide the required information within 30 days of receipt of this letter.

The information requested in this letter affects fewer than 10 respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

1984
James R. Miller, Chief
Operating Reactors Branch #3
Division of License

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