

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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October 28, 1992

Docket No. 50-423
B14258

Re: GL-90-06

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Generic Letter 90-06, "Resolution of Generic Issue 70,
'Power-Operated Relief Valve and Block Valve Reliability,' and
Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for
Light-Water Reactors,' Pursuant to 10CFR50.54(f),"
(TAC Nos. M77362 and M77432)

In a letter dated June 25, 1990,⁽¹⁾ the NRC issued Generic Letter (GL) 90-06. By letters dated December 21, 1990,⁽²⁾ and March 21, 1991,⁽³⁾ Northeast Nuclear Energy Company (NNECO) on behalf of Millstone Unit No. 3, submitted initial and revised responses to the Staff.

- (1) James G. Partlow letter to All Pressurized Water Reactor Licensees and Construction Permit Holders, "Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10CFR50.54(f)," dated June 25, 1990.
- (2) E. J. Mroccka letter to the U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 2 and 3, Generic Letter 90-06, Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10CFR50.54(f)," dated December 21, 1990.
- (3) E. J. Mroccka letter to the U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 2 and 3, Generic Letter 90-06, Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10CFR50.54(f)," dated March 21, 1991.

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In a letter dated August 24, 1992,⁽⁴⁾ the NRC stated that NNECO's response did not adequately meet the Staff position regarding the 18-month power-operated relief valve (PORV) stroke testing. Specifically, the Staff is not accepting Mode 5 (Cold Shutdown) testing simply because it is allowable by the ASME Code or that the NRC-approved In-Service Test (IST) Program includes Mode 5 for this particular test. The Staff further restated its position which requires the 18-month PORV stroke test to be performed during Mode 3 (Hot Standby) or Mode 4 (Hot Shutdown) and in all cases prior to establishing conditions where the PORVs are used for low-temperature overpressure protection (LTOP).

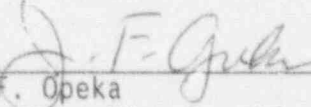
NNECO has reviewed its earlier position and hereby commits to perform the 18-month PORV stroke test during Mode 3 or Mode 4 only when entering into Mode 3 or 4 from higher mode operations (Modes 1 or 2). This test will be a static test, whereby the PORV will be exposed to Mode 3 or 4 temperatures, and then isolated from the primary system and tested to verify valve operability. A license amendment request for the Millstone Unit No. 3 Technical Specifications will be processed to include the above test. An amendment request will be submitted to the NRC by the end of January 1993. The surveillance procedures related to this test are being modified to reflect this test and will be implemented upon issuance of the amendment.

In addition, the PORVs are being, and will continue to be, demonstrated operable in all cases prior to establishing conditions where the PORVs are used for LTOP (Millstone Unit No. 3 Technical Specification 4.4.9.3.1).

We hope you find the above information responsive to your request. If you should have any questions on the above, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: See Page 3

(4) V. L. Rooney letter to J. F. Opeka, "Staff Review of Generic Letter 90-06, 'Resolution of Generic Issue 70, 'Power-Operated Relief Valve and Block Valve Reliability,' and Generic Issue 94, 'Additional Low-Temperature Overpressure Protection for Light-Water Reactors,' Pursuant to 10CFR50.54(f)," dated August 24, 1992.

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cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2,
and 3

Subscribed and sworn to before me

this 28th day of October, 1992

Deborah D. Farley
Notary Public

Date Commission Expires: 12/31/95