



Northeast  
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270  
(203) 665-5000

September 22, 1994

Docket No. 50-336  
B14985

Re: 10CFR50.55a(a)(3)

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

Millstone Nuclear Power Station, Unit No. 2  
Request to Use Alternatives to ASME Code Section XI

The purpose of this letter is for Northeast Nuclear Energy Company (NNECO) to request the use of an alternative to the ASME Boiler and Pressure Vessel Code Section XI for Millstone Unit No. 2 pursuant to the provisions of 10CFR50.55a(a)(3). Specifically, NNECO requests approval to use the provisions of Code Case N-416-1, "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2 and 3, Section XI, Division 1" and Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems, Section XI, Division 1."

During the upcoming Millstone Unit No. 2 outage, NNECO will be making code repairs to Section XI components. These code repairs require that a Section XI hydrostatic test be performed. Since this is Millstone Unit No. 2's second inservice inspection outage, several ten-year system hydrostatic tests are currently scheduled for completion. The performance of the hydrostatic tests, as currently required by the Code, would result in a substantial hardship to the plant in the form of additional expenditures of funds to perform the tests and additional exposure to the individuals involved in the tests without realizing a commensurate gain in safety. The issuance of these code case revisions by the ASME, with NRC acceptance, provides the basis for the approval of the alternatives which have been determined by the ASME consensus process to provide an acceptable level of quality and safety.

NNECO is aware that the NRC is in the process of approving these Code Cases and will be incorporating them, whenever possible, into Regulatory Guide 1.147. NNECO has recently learned that these Code Cases may not appear in the next revision of Regulatory Guide 1.147 as was anticipated. This unforeseen delay has a very significant

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impact for Millstone Unit No. 2, since Unit 2 will be entering an outage in October 1994 and wishes to use these code cases. Therefore, approval is requested by October 15, 1994.

If you should have any questions on this request, please contact Mr. R. H. Young at (203) 440-2073.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka  
Executive Vice President

BY:   
E. A. DeBarba  
Vice President

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