

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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April 1, 1986

Docket No. 50-423
B12028

Office of Nuclear Reactor Regulation
Attn: Mr. Vincent S. Noonan, Director
PWR Project Directorate #5
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Reference: (1) J. F. Opeka letter to B. J. Youngblood, Request for Relief
from Preservice Inspection, dated December 23, 1985.

Dear Mr. Noonan:

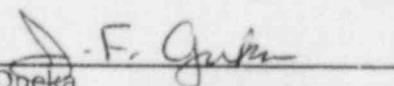
Millstone Nuclear Power Station, Unit No. 3
Request for Additional Relief from Preservice Inspection

Northeast Nuclear Energy Company (NNECO) submitted formal requests for relief from performing certain preservice inspections in the above reference. These requests have been evaluated by the Staff and relief was granted in Supplement 5 to NUREG-1031, Millstone Nuclear Power Station, Unit No. 3 Safety Evaluation Report.

Following the submittal of the above referenced requests, additional welds have been identified which should have been included in Relief Request PR-4 and PR-12. Attached please find revised PR-4 and PR-12 Relief Request pursuant to 10CFR 1.55(a)(g)(iii). The bases for these requests remain essentially the same, however, changes to clarify the intent have been made and are identified by change bars in the attachment to this letter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



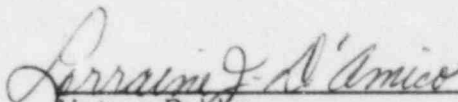
J. F. Opeka
Senior Vice President

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STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me J. F. Opeka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, a Licensee herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Licensees herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.


Notary Public

My Commission Expires March 31, 1988

Millstone Nuclear Power Station Unit No. 3
Relief From Preservice Inspection Requirements

Relief Request: PR-4

Component Identification:

Code Class: 1

Examination Category: B-L-2 and B-M-2

Code Requirement:

For Millstone Unit No. 3, a visual examination (VT-3) of the internal surfaces shall be conducted for the following items in accordance with ASME B&PV Code, 1980 Edition through the Winter 1980 Addenda.

<u>Item</u>	<u>Description</u>
B12.40	Valve bodies exceeding 4" NPS
B12.20	Pump casings

Note: Examinations are limited to:

- A. One valve within each group of valves that are of the same design, manufacturing method, and are performing similar functions in the system.
- B. One pump per group performing similar functions.

Code Relief Request:

Pursuant to 10CFR50-55(a)(g)5(iii), relief is requested from performing a preservice visual examination (VT-3).

Support for Relief/Alternate Examinations

For the reactor coolant pump casings and 35 valve bodies (see attached) in the reactor coolant, pressurizer, safety injection, and residual heat removal systems, relief is requested from disassembly of an operable valve or pump for the performing a preservice visual examination (VT-3).

The requirement to disassemble an operable valve or pump for the sole purpose of performing a visual examination (VT-3) of the internal pressure retaining boundary is impractical and not commensurate to the increased safety achieved by this inspection. Class 1 valves and pumps are installed in their respective systems and many have completed functional testing. To disassemble these items would provide a very small potential for increasing plant safety margins with a very disproportionate impact on expenditures of plant manpower and resources.

The manufacturer's test data will be used in lieu of a preservice visual examination (VT-3). This includes documentation of examinations performed during fabrication and installation of the subject valves. The examinations performed may include volumetric, surface, and visual examinations, as required by ASME Section II, Material Specifications for Ferrous and Nonferrous Material, and ASME Section III, Construction and Installation Requirements.

Class 1 valves and pumps are subjected to numerous types of nondestructive testing and a rigorous quality assurance program during all stages of fabrication, storage, and installation. These valves and pumps have been found acceptable by the manufacturer, the ASME Authorized Nuclear Inspector, and Northeast Utilities' Quality Assurance. During maintenance of Class 1 pumps, a visual examination (VT-3) will be performed during in-service.

Zone	Valve/Pump No.	Line No.	Operator Instrument No.
8	RCS-P1A	Reactor Coolant Pump	
9	RCS-P1B	Reactor Coolant Pump	
10	RCS-P1C	Reactor Coolant Pump	
11	RCS-P1D	Reactor Coolant Pump	
12	V2	3-RCS-29-2-1	MV-8001A
12	V1A	3-RCS-275-5-1	MV-8002A
13	V3	3-RCS-275-10-1	MV-8002B
13	V4	3-RCS-029-7-1	MV-8001B
14	V6	3-RCS-029-12-1	MV-8001C
14	V5	3-RCS-275-15-1	MV-8002C
15	V8	3-RCS-029-17-1	MV-8001D
15	V7	3-RCS-275-20-1	MV-8002D
20	V173	3-RCS-006-84-01	SV-8010C
20	V172	3-RCS-006-83-01	SV-8010B
20	V171	3-RCS-006-82-01	SV-8010A
22	V987	3-SIL-006-139-01	Check
22	V15	3-SIL-010-45-01	Check
22	V30	3-RCS-010-122-01	Check
23	V71	3-RCS-010-132-1	Check
23	V986	3-RCS-006-140-1	Check
23	V17	3-SIL-005-5-1-1	Check
24	V26	3-SIL-008-155-1	Check
24	V932	3-SIL-006-161-1	Manual
24	V69	3-SIL-006-21-1	Check
25	V107	3-RCS-010-138-1	Check
25	V985	3-SIL-006-145-1	Check
25	V19	3-SIL-010-49-1	Check
26	V146	3-RCS-010-146-1	Check
26	V21	3-SIL-010-51-1	Check
26	V984	3-SIL-006-146-1	Check
27	V999	3-RCS-012-123-1	MV-8701C
27	V997	3-RHS-012-33-1	MV-8701A

Zone	Valve/Pump No.	Line No.	Operator Instrument No.
27	V26	3-SIH-006-59-1	Check
28	V933	3-SIL-006-25-1	Manual
28	V142	3-SIL-006-25-1	Check
28	V996	3-RHS-012-35-1	MV-8702B
28	V28	3-SIL-008-156-1	Check
28	V998	3-RCS-012-103-1	MV-8702C
29	V9	3-RCS-008-025-1	MV-8003A
30	V53	3-RCS-008-30-1	MV-8003B
31	V87	3-RCS-008-035-1	MV-8003C
32	V128	3-RCS-008-40-1	MV-8003D
39	V102	3-RCS-006-120-01	Check

Relief from Preservice Inspection Requirements

Relief Request:

PR-12

Code Class: 2

Examination Category: C-F, Pressure Retaining Welds in Piping

Code Item Nos.: C5.11
C5.12
C5.21
C5.22
C5.30

Code Requirement:

For Millstone Unit No. 3, volumetric (ultrasonic) and surface examination of essentially 100 percent of the length of each weld requiring examination shall be conducted in accordance with the ASME B&PV Code, Section XI, 1980 Edition thru the Winter 1980 Addenda.

Code Relief Request:

Pursuant to 10CFR50.55(a)(g)5(iii), relief is requested from performing the preservice volumetric and/or surface examinations on the inaccessible portions of the welds listed in Table 1 (attached).

Reason for Relief:

Geometric configuration, permanent obstructions and/or structural interferences, or being buried or encased in concrete prohibit 100 percent examination coverage of the Code Required Volume or area. Relief is, therefore, requested from performing preservice examinations on the inaccessible portions of certain circumferential welds as noted in Table 1 (attached). Intersecting longitudinal welds are included but not specifically identified.

Proposed Alternative Examinations

General

- A. The subject welds received volumetric examination by radiography during fabrication in accordance with ASME Section III requirements. Having met these requirements, adequate assurance of the structural integrity of the subject welds is provided.
- B. A Section III hydrostatic test was conducted successfully on the Class 2 Pressure Boundary, of which these welds are a part thereof.

- C. Inservice System Leakage Tests will be performed per Category C-H IWC-2500-1 (except for welds on open-ended portions of systems) as well as surface and volumetric exams (except for buried components) as required by Section XI selection criteria (IWC-2500-1). Any advances in UT technology will be evaluated to determine its application for achieving maximum volume coverage and results.

Specific

- D. For the open-ended portions of the Recirculation Spray System (RSS) extending from the containment sump, in addition to the above requirements, the integrity of the piping will be verified in-service by periodic Integrated Leakage Rate Tests as required by 10CFR50, Appendix J (Zones 103-106). Note: These lines are exempt per approved code case N408.
- E. For the buried portions of the Low-Pressure Safety Injection System (SIL), integrity will be verified by periodic flow or pressure drop tests as required by paragraph IWA-5244 (Zone 119).
- F. For the branch connection welds in the Feedwater System (FWS) covered by reinforcing pads, in addition to the above general requirements, a supplemental UT examination was performed by the installer to verify integrity. A surface examination was also performed by the installer on the reinforcing pad to pipe welds. These welds will receive a surface examination inservice, in lieu of the branch connection welds, in accordance with Category C-C IWC-2500-5 (Zones 69-72).

TABLE 1

CLASS-2

Code Cat. C-F Welds

<u>Zone No.</u>	<u>Weld Identification</u>	<u>Data Package Number</u>	<u>Material Type</u>	<u>Exam Angle</u>	<u>Technique</u>	<u>Configuration/Limitations</u>	<u>Percent Coverage</u>
60	Item 330 MSS-501-FW-5-3-M	UT-03-89	SA-155 GRKC-70CL1 to SA-234 WPC	45°	3/2 Vee	Permanently Installed Whip Restraint	74%
61	Item 140 MSS-33-FW-1-GM	UT-03-47	SA-155 GRKC-70CL1 to SA-234 WPC	45°	3/2 Vee	Geometric Configuration Pipe to CAP Weld	85%
	Item 170 MSS-33-FW-1-HM	UT-03-183	SA-155 GRKC-70CL1 to SA-234 WPC	45°	3/2 Vee	Geometric Configuration Pipe to CAP Weld	85%
62	Item 130 MSS-34-FW-2-GM	UT-03-39	SA-155 GRKC-70CL1 to SA-234 WPC	45°	3/2 Vee	Geometric Configuration Pipe to CAP Weld	85%
	Item 160 MSS-34-FW-1-PM	UT-03-41	SA-155 GRKC-70CL1 to SA-234 WPC	45°	3/2 Vee	Geometric Configuration Pipe to CAP Weld	85%
	Item 460 DTM-31-FW-1	UT-03-168	SA-105 to SA-106	45°	3/2 Vee	Branch Line Obstructs Part of Scan Area	90%

<u>Zone No.</u>	<u>Weld Identification</u>	<u>Data Package Number</u>	<u>Material Type</u>	<u>Exam Angle</u>	<u>Technique</u>	<u>Configuration/Limitations</u>	<u>Percent Coverage</u>
63	Item 140 MSS-35-FW-1-HM	UT-03-56	SA-155 GRKC-70CL1 to SA-234 WPC	45°	3/2 Vee	Geometric Configuration Pipe to CAP Weld	85%
	Item 170 MSS-35-FW-1-GM	UT-03-152	SA-155 GRKC-70CL1 to SA-234 WPC	45°	3/2 Vee	Geometric Configuration Pipe to CAP Weld	85%
	Item 310 DTM-28-FW-1	UT-03-170	SA-105 to SA-106	45°	3/2 Vee	Branch Line Obstructs Part of Scan Area	95%
64	Item 140 MSS-36-FW-1-HM	UT-03-119	SA-155 GRKC-70CL1 to SA-234/WPC	45°	3/2 Vee	Geometric Configuration Pipe to CAP Weld	85%
	Item 180 MSS-36-FW-1-BM	UT-03-163	SA-155 GRKC-70CL1 to SA-234/WPC	45°	3/2 Vee	Branch Line Obstructs Part of Scan Area	98%
	Item 310 DTM-25-FW-1	UT-03-177	SA-105 to SA-106	45°	3/2 Vee	Branch Line Obstructs Part of Scan Area	89%
	Item 170 MSS-36-FW-1-GM	UT-03-224	SA-155 GRKC-70CL1 to SA-234-WPC	45°	3/2 Vee	Geometric Configuration Pipe to Safety Valve	91%
66	Item 180 FWS-21-FW-6-DM	UT-03-201	SA-106 GRB	45°	3/2 Vee	Geometry of Joint as Well as Crown Condition	75%
67	Item 110 FWS-22A-FW-4-C-M	UT-03-19	SA-106 GRB	45°	3/2 Vee	Building Wall, 2 Support Lugs and 3"x9" Welded Plate Obstruct	25%

Zone No.	Weld Identification	Data Package Number	Material Type	Exam Angle	Technique	Configuration/Limitations	Percent Coverage
67	Item 260 FWA-510-FW-10-3M	UT-03-233	SA-234 WPB	45°	3/2 Vee	Reducer Obstructs Part of Scan Area	93%
69	Item 150 FWS-11-FW-68-1	None	SA-106, GRC to SA-106, GRC	N/A	N/A	Weld Completely Inaccessible due to Reinforcing Pad	0%
70	Item 140 FWS-13-FW-62-1	None	SA-106, GRC to SA-106, GRC	N/A	N/A	Weld Completely Inaccessible due to Reinforcing Pad	0%
71	Item 140 FWS-15-FW-57	None	SA-106, GRC to SA-106, GRC	N/A	N/A	Weld Completely Inaccessible due to Reinforcing Pad	0%
72	Item 140 FWS-17-FW-60-1	None	SA-106, GRC to SA-106, GRC	N/A	N/A	Weld Completely Inaccessible due to Reinforcing Pad	0%
77	Item 90 SIL-159-FW-6	UT-02-88	SA-312/TP 304 to SA-182/F316	45°	3/2 Vee	4 welded Support Lugs Obstruct Scan Area	50%
78	Item 100 SIL-160-FW-6	LP-309 UT-02-213	SA 312/TP304 to SA-182/F316	45°	3/2 Vee	4 Welded Support Lugs Obstruct Scan Area	70% 70%
79	Item 10 SIL-9-FW2	UT-02-217	SA-182/F316 to SA-376/TP316	45°	3/2 Vee	Branch Line and ASME Code Data Plate Obstructs Part of Scan Area	87%
	Item 130 SIL-9-FW-1	UT-02-111	SA-182/F316 to SA-376/TP316	45°	3/2 Vee	Branch Line Obstructs Part of Scan Area	90%
80	Item 110 504-1-SW-9	UT-02-86	SA-376/TP 316 to SA-403/WP 316	45°	3/2 Vee	Drain Line Obstructs Part of Scan Area	95%

Zone No.	Weld Identification	Data Package Number	Material Type	Exam Angle	Technique	Configuration/Limitations	Percent Coverage
80	Item 120 SIL-504-FW-16	UT-02-86	SA-182/F316 to SA-376/TP316	45°	3/2 Vee	Drain Line Obstructs Part of Scan Path	95%
81	Item 10 SIL-25-FW-2	UT-02-108	SA-182/F316 to SA-376/TP316	45°	3/2 Vee	Drain Line Obstructs Part of Scan Path	90%
	Item 20 SIL-25-FW-1-7M	UT-02-01	SA-376/TP316 to SA-403/WP316	45°	3/2 Vee	Drain Line Obstructs Part of Scan Path	90%
86	Item 810 R115-7-FW-4	UT-011-34	SA-312/TP304 to SA-403/WP304	70°	1/2 Vee	Welded Support Lugs Obstruct Scan	50%
103	RSS-001-FW-1	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	001-1-SW-B	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	001-1-SW-C	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	001-i-SW-D	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	001-1-SW-E	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	001-1-SW-F	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	RSS-001-FW-2	N/A	SA312/TP304	N/A	PT	Buried Components	0%
104	RSS-006-FW-1	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	006-1-SW-B	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	006-1-SW-C	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	006-1-SW-D	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	006-1-SW-E	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	006-1-SW-F	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	RSS-006-FW-2	N/A	SA312/TP304	N/A	PT	Buried Components	0%

<u>Zone No.</u>	<u>Weld Identification</u>	<u>Data Package Number</u>	<u>Material Type</u>	<u>Exam Angle</u>	<u>Technique</u>	<u>Configuration/Limitations</u>	<u>Percent Coverage</u>
105	RSS-004-FW-1	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-B	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-C	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-D	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-E	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-F	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	RSS-004-FW-2	N/A	SA312/TP304	N/A	PT	Buried Components	0%
106	RSS-004-FW-1	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	016-1-SW-B	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-C	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-D	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-E	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	004-1-SW-F	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	RSS-004-FW-2	N/A	SA312/TP304	N/A	PT	Buried Components	0%
107	Item 10 FWA-22-FW-3	MP-195	CS	N/A	MT	Approximately 30% of the weld was inaccessible due to the close proximity of the line to the floor.	70%
107	Item 30 3-4-SWC	MP-196	CS	N/A	MT	Approximately 30% of the weld was inaccessible due to the close proximity of the line to the floor.	70%
107	Item 40 FWA-22-FW-6-1	MP-197	CS	N/A	MT	Approximately 30% of the weld was inaccessible due to the close proximity of the line to the floor.	70%
107	Item 20	MP-200	CS	N/A	MT	Approximately 30% of the weld was inaccessible due to the close proximity of the line to the floor.	70%
108	Item 70 5-4-SW-G	MP-207	CS	N/A	MT	Interference from support PSR-235	80%

<u>Zone No.</u>	<u>Weld Identification</u>	<u>Data Package Number</u>	<u>Material Type</u>	<u>Exam Angle</u>	<u>Technique</u>	<u>Configuration/Limitations</u>	<u>Percent Coverage</u>
119	SIL-152A-FW-3	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	508-3-SW-3	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	508-3-SW-2	N/A	SA312/TP304	N/A	PT	Buried Components	0%
119	SIL-152A-FW-6	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	508-6-SW-5	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	508-6-SW-2	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	SIL-152A-FW-5	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	508-5-SW-4	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	SIL-152A-FW-4	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	508-21-SW-9	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	508-4-SW-3	N/A	SA312/TP304	N/A	PT	Buried Components	0%
	SIL-152A-FW-2	N/A	SA312/TP304	N/A	PT	Buried Components	0%