

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 665-5000

July 14, 1987

Docket No. 50-336

B12572

Re: 10CFR50, Appendix J

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
10CFR50 Appendix J

Northeast Nuclear Energy Company (NNECO) has recently evaluated twelve (12) valves that have been part of the 10CFR50 Appendix J Type C test program at Millstone Unit No. 2 and, based upon this evaluation, have determined that these valves should not be subject to those requirements. The purpose of this letter is to inform the NRC Staff of our determination that these valves can be removed from the 10CFR50 Appendix J testing program. The twelve valves are as follows:

- o 2-RB-28.1A, B, C, D
- o 2-RB-28.2A, B, C, D
- o 2-RB-28.3A, B, C, D

These valves are Fisher Series 9200 butterfly valves and are located in the Reactor Building Closed Cooling Water (RBCCW) System piping at the containment boundary. This portion of the RBCCW system at Millstone Unit No. 2 performs the safety related function of cooling the containment air recirculation system air coolers. Since RBCCW performs a safety related function, water will be circulating through the RBCCW piping in containment during a DBA. The minimum operating pressure of the RBCCW system inside containment is 60 psig.

Since the maximum pressure inside containment for a DBA is 54 psig, any leakage through packing seals would be into containment from the RBCCW system. The need for RBCCW system flow to support the function of safety related equipment precludes the use of the subject valves for containment isolation. The fact that any leakage associated with RBCCW during a DBA would be out of the system into containment means that use of these valves for containment isolation is not necessary.

A017  
1/0

The RBCCW containment isolation valves in question are designed to remain open during accident conditions. At least one RBCCW pump will be automatically loaded onto an emergency diesel to provide flow to a supply and return header through normally aligned safety related coolers during a DBA (i.e., Safety Injection Actuation Signal (SIAS) and a loss of normal power signal automatically line up the RBCCW pumps to the diesel generators). These design conditions imply that the RBCCW system is not expected to be isolated from containment by the subject valves during accident conditions.

The RBCCW system is vented through its surge tank. The surge tank provides a 42 psig head to the piping system it feeds due to its elevation. Therefore, for post accident containment conditions with no RBCCW system operation, containment atmosphere leakage into the RBCCW system would have to be driven by a pressure greater than 42 psig to displace water in the inoperative RBCCW loop. This is unlikely considering that the peak containment DBA pressure is only a brief pressure spike that quickly drops off with initiation of containment spray.

Even if the post accident containment atmosphere is assumed to reach the surge tank and escape into the enclosure building, there should be no uncontrolled off-site release. Such releases would be collected and processed by the Enclosure Building Filtration System (EBFS). Any liquids spilled at the surge tank would be retained within the enclosure building.

10CFR50 Appendix J states that the valves required to be part of a Type C test program are those that:

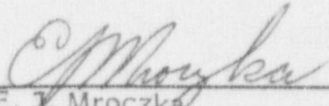
1. provide a direct connection between the inside and outside atmospheres of the primary reactor containment under normal operation, such as purge and ventilation, vacuum relief, and instrument valves;
2. are required to close automatically upon receipt of a containment isolation signal in response to controls intended to effect containment isolation;
3. are required to operate intermittently under postaccident conditions; or
4. are in main steam and feedwater piping and other systems which penetrate containment of direct-cycle boiling water power reactors.

The subject valves do not fit into any of the above referenced categories. Therefore, it is the conclusion of NNECO that based on the above, these valves should not be subject to testing in accordance with 10CFR50 Appendix J and therefore have been removed from the program.

U. S. Regulatory Commission  
B12572/Page 3  
July 14, 1987

This letter is intended for information purposes only and no Staff action is being requested. If you have any questions, please contact us.

Very truly yours,

  
\_\_\_\_\_  
E. J. Mroczka  
Senior Vice President

cc: W. T. Russell, Region I Administrator  
D. H. Jaffe, NRC Project Manager, Millstone Unit No. 2  
T. Rebelowski, Resident Inspector, Millstone Unit Nos. 1 and 2