

**NORTHEAST UTILITIES**

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

June 9, 1989

Docket No. 50-336  
B13270

Re: ASME Section XI Program

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

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2  
Safety Class Piping System Leak Repair Program

Per a request from the NRC resident inspector, Northeast Nuclear Energy Company (NNECO) submits the following information to the NRC Staff regarding repairs to Safety Class 1, 2, and 3 systems that deviate from ASME requirements.

At present, NNECO has reviewed all applicable systems for non-Code repairs and has found that all permanent repairs have been conducted in accordance with ASME Section XI requirements. When a defect is found in an ASME system, prior to making a permanent repair, the defect is evaluated from an operational, structural, and seismic standpoint within the context and constraints of the Technical Specifications and Final Safety Analysis Report. Concurrently, there are several techniques available and at times utilized to stop leaks in order to prevent water damage to adjacent equipment. These techniques consist of temporary repairs that will stop the leak but do not reestablish the original strength of the pipe/component. Based on the evaluation, continued service can often be justified, with the temporary measure in place, until such time that the pipe/component can be permanently repaired or replaced.

All such temporary repairs are tracked via normal plant surveillances and permanent code repairs are implemented as soon as plant operating conditions allow. In almost all cases this would be no later than the next refuel outage.

Two examples of defects that were found in the Service Water (SW) system that were or are currently being evaluated and justified for continued service are described as follows. The first example is erosion/corrosion of the valve body of 2-SW-8.1C and the second is two through wall leaks in the 6-inch SW supply pipe to the sodium hypochlorite system.

Valve 2-SW-8.1C is the temperature control valve located on the SW discharge piping from the Reactor Building Closed Cooling Water System (RBCCW). This valve is an 18-inch air operated butterfly valve that throttles SW flow through the "C" RBCCW heat exchanger to control RBCCW system temperature in

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the "B" header. This valve was removed from service during December 1988 due to operational problems. While it was out, it was discovered that the valve body had locally eroded/corroded due to valve boot/seat misalignment. The local erosion/corrosion consumed approximately 36% of the wall thickness. This condition was evaluated and was found to be acceptable based on the remaining wall thickness. The eroded/corroded area was built up with a filler material in order to regain the original contours of the inner surface of the valve body, which holds the boot in place. A replacement valve will be procured.

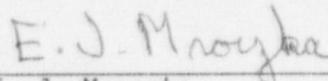
The leaks in the SW supply pipe to the sodium hypochlorite system were ultrasonically inspected and are currently being evaluated as to their long term effect on system operation and integrity. Based on other similar defects previously analyzed, it is anticipated that continued service will be justified. Stainless steel bands and rubber patches were installed to prevent water damage to other equipment in the area. Permanent repairs being considered are welding patches over the defects or replacement of the pipe.

In addition to the above mentioned SW temporary repairs, sealant injection type temporary leak repair techniques have been, and will continue to be, implemented under the requirements and controls of the applicable Maintenance and Engineering special process procedures, when conditions warrant.

We trust the above information satisfactorily responds to your concerns. Should you have any questions concerning the above discussion, or if you would like further information, please contact us.

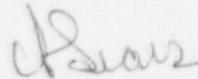
Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



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Senior Vice President



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