



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

August 14, 1989

Docket No. 50-336

Mr. Edward J. Mroczka  
Senior Vice President  
Nuclear Engineering and Operations  
Connecticut Yankee Atomic Power Company  
Northeast Nuclear Energy Company  
P.O. Box 270  
Hartford, Connecticut 06141-0270

Dear Mr. Mroczka:

SUBJECT: MILLSTONE NUCLEAR STATION, UNIT NO. 2 REACTOR BUILDING CLOSED  
COOLING WATER (RBCCW) SYSTEM - CONTAINMENT ISOLATION VALVES  
(TAC NO. 73760)

We have completed our review of your June 20, 1989 letter regarding your backfit concerns over the staffs position to keep leak rate testing of the Millstone Unit 2 RBCCW containment isolation valves in the Appendix J program. Table 5.2-11 of the Millstone Unit 2 FSAR identifies the subject RBCCW valves as requiring Type "C" testing; thus, these valves have been established as containment isolation valves requiring Type "C" testing as part of the current design basis of the facility. In addition, as discussed in our earlier letters, it is our position that Appendix J to 10 CFR Part 50 requires these valves to be tested. Your letter of January 7, 1988 clearly identifies the associated RBCCW piping and containment air recirculation cooling coils inside containment as being fabricated to Safety Class 3 standards. While we agree that the subject RBCCW piping provides a closed system inside containment, the existence of Safety Class 3 components in the system does not provide adequate assurance of post-accident integrity. We are not proposing that you change the design basis of the RBCCW system inside containment; however, you have not provided acceptable justification for suspension of Type "C" testing for the RBCCW containment isolation valves, and therefore must continue to Type "C" test these valves in accordance with Appendix J.

Since Appendix J (Type "C") testing of the subject containment isolation valves was part of the original design basis for Millstone Unit 2, denial of relief from such testing cannot be considered as a "Backfit" within the definition stated in 10 CFR Part 50, Section 50.109(a)(1).

Mr. Edward J. Mroczka  
Northeast Nuclear Energy Company

Millstone Nuclear Power Station  
Unit No. 2

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Mr. Edward J. Mroczka

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Accordingly, we herein reaffirm our position that the subject RBCCW containment isolation valves must undergo local leak rate (Type "C") testing per Appendix J to 10 CFR Part 50.

Sincerely,

/s/

Steven A. Varga, Director  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

cc: See next page

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[TAC NO. 73760]

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