

January 5, 2000

Mr. R. P. Necci - Vice President
Nuclear Oversight and Regulatory Affairs
c/o Mr. David A. Smith
Northeast Nuclear Energy Company
P. O. Box 128
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NO. 3 - REQUEST FOR ADDITIONAL INFORMATION ON SECOND 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN REQUESTS FOR RELIEF (TAC NO. MA5446)

Dear Mr. Necci:

By letter dated April 27, 1999, Northeast Nuclear Energy Company submitted requests for relief IR-2-01 through IR-2-09, seeking relief from the requirements of American Society of Mechanical Engineers (ASME) Code, Section XI, for Millstone Nuclear Power Station, Unit 3 second 10-year inservice inspection (ISI) interval. Enclosed is a request for additional information regarding your requests for relief. In order for the staff to complete its review of your requests within its planned schedule, your response is requested within 30 days of the date of this letter. In addition to providing your response to the Nuclear Regulatory Commission (NRC), you are also requested to provide a copy of your response to the NRC's contractor, Idaho National Engineering and Environmental Laboratory (INEEL), who is conducting this review at the following address:

Michael T. Anderson, INEEL Research Center, 2151 North Boulevard, P. O. Box 1625, Idaho Falls, Idaho 83415-2209

If circumstances result in the need to revise your response date, please call Mr. Victor Nerses at (301) 415-1484 at the earliest opportunity.

Sincerely,

ORIGINAL SIGNED BY:
John A. Nakoski, Senior Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosure: Request for Additional Information

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Waterford, CT 06385-0128

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Idaho Falls, Idaho 83415-2209

If circumstances result in the need to revise your response date, please call Mr. Victor Nerses at (301) 415-1484 at the earliest opportunity.

Sincerely,

A handwritten signature in black ink that reads "John A. Nakoski".

John A. Nakoski, Senior Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-423

Enclosure: Request for Additional Information

cc w/encl: See next page

Millstone Nuclear Power Station
Unit 3

cc:

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Millstone Nuclear Power Station
Unit 3

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**Request for Additional Information Related to
Second 10-Year Inservice Inspection Program Relief Requests**

Regulatory Basis for the Request for Additional Information

In accordance with 10 CFR 50.55a(c)(3), 10 CFR 50.55a(d)(2), and 10 CFR 50.55a(e)(2), ASME Code Cases may be used as alternatives to Code requirements. Code Cases that the NRC has approved for use are listed in the current revision of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability," with any additional conditions deemed necessary by the NRC. Code Cases not referenced in Regulatory Guide 1.147 may be adopted only if authorized by the NRC on a case-by-case basis. In some cases, use of unapproved Code Cases may be acceptable for use when certain conditions are included. To ensure consistent implementation, licensees proposing the use of currently unapproved Code Case(s), must commit to such conditions, if applicable.

Additional Information Required

1. **Request for Relief No. IR-2-08:** Code Case N-533, Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure-Retaining Bolted Connections, does not provide details of the examination parameters for the system pressure test. As a condition for use of this Code Case, the NRC requires that the system pressure test and corresponding VT-2 visual examination with the insulation in place is to be performed with a minimum 4-hour hold time after attaining a test pressure of not less than the nominal operating pressure associated with 100 percent rated reactor power. The 4-hour hold allows time for leakage to penetrate the insulation, providing a means of detecting any significant leakage with the insulation in place. Specific details concerning the hold time associated with the proposed alternative were not provided in the submittal. Please provide information on the hold times used for inspecting insulated pressure-retaining bolted connections that demonstrates that this condition (a 4-hour hold time) is met.

2. **Request for Relief No. IR-2-09:** Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee proposed the use of Code Case N-546, Requirements for Qualification of VT-2 Examination Personnel, Section XI, Division 1. To find this Code Case acceptable for use, the NRC has determined that the following conditions must be met:

The licensee must:

- a. Qualify examination personnel by test to demonstrate knowledge of Section XI and plant-specific procedures for VT-2 visual examination,

AND

- b. Re-qualify examination personnel in accordance with the frequency specified in IWA-2314.

Please provide information on how these two conditions have been met.

Enclosure