

October 28, 2003

MEMORANDUM TO: James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager, Section 2 /RA/
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2,
FACSIMILE TRANSMISSION, ISSUES TO BE DISCUSSED IN AN
UPCOMING CONFERENCE CALL (TAC NO. MC0743)

The attached information was transmitted by facsimile on October 27, 2003, to Mr. David Dodson of Dominion Nuclear Connecticut, Inc. (the licensee). This information was transmitted to facilitate a upcoming conference call in order to clarify the licensee's relief request RR-89-45 for Millstone Power Station, Unit No. 2 dated September 15, 2003. The licensee's submittal proposes alternatives to certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for the acceptance standards associated with half-nozzle repair/replacements for Alloy 600 small bore nozzles. Specifically, Relief Request RR-89-45 proposes use of alternative acceptance standards to allow flaws to remain in place following repair/replacement of instrumentation nozzles on the pressurizer, the steam generator channel heads, and the reactor coolant system piping.

This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-336

Attachment: Issues for Discussion in Upcoming Telephone Conference

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ISSUES FOR DISCUSSION IN UPCOMING TELEPHONE CONFERENCE

RELATED TO RELIEF REQUEST RR-89-45

ACCEPTANCE STANDARDS FOR

REPAIR/REPLACEMENT OF ALLOY 600 SMALL BORE NOZZLES

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

By letter dated September 15, 2003, Dominion Nuclear Connecticut, Inc. (the licensee), submitted proposed relief request RR-89-45 for Millstone Power Station, Unit No. 2. The licensee's submittal proposes alternatives to certain requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for the acceptance standards associated with half-nozzle repair/replacements for Alloy 600 small bore nozzles. Specifically, Relief Request RR-89-45 proposes use of alternative acceptance standards to allow flaws to remain in place following repair/replacement of instrumentation nozzles on the pressurizer, the steam generator channel heads, and the reactor coolant system piping.

The NRC staff has reviewed the information the licensee provided that supports the proposed relief request and would like to discuss the following issues to clarify the submittal dated September 15, 2003:

- 1) Section 6.1 of RR-89-45, "Structural Integrity," describes a series of plant specific evaluations that will be performed for each of the components where a half-nozzle repair/replacement is installed. You state that design qualification and structural integrity are demonstrated in accordance with ASME Section III with evaluation of unrepaired flaws in accordance with ASME Section XI. Typically, the staff does not grant written or verbal relief where the basis for the relief is not completed or done. Secondly, in the precedent you cited, the licensee performed the necessary fracture mechanics analysis prior to the granting of relief. Please provide the necessary calculations discussed in your basis or discuss the results and conclusions drawn from having performed the calculations you cite as part of your basis. Reference: Saint Lucie Units 1 and 2 (TAC No. MB7199/7200) and South Texas Project (TAC No. MB9727).
- 2) Section 7.0 of RR-89-45, "Duration of the Proposed Alternative," states that the remnant nozzle will remain in place for the life of the plant. In the precedent cited in your relief request, the duration of the relief request granted by the staff was for one cycle of operation. Recognizing that your alternative is for multiple cycles, please discuss your plans for the successive inspections per the requirements of IWB-2420(b) since the flaw(s) is to be left in place.
- 3) Since the flaws in the remnant J-groove weld are to remain in place, please discuss compliance with the requirements of 1992 ASME Section XI, IWB-3420, for characterization of the remaining flaws.