

# NORTHEAST UTILITIES



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

General Offices • Seiden Street, Berlin, Connecticut

P.O. BOX 270  
HARTFORD, CONNECTICUT 06141-0270  
(203) 865-5000

January 21, 1991

Docket No. 50-336  
A09166

Mr. E. C. Wenzinger, Chief  
Projects Branch No. 4  
Division of Reactor Projects  
U. S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

Dear Mr. Wenzinger:

Millstone Nuclear Power Station, Unit No. 2  
RI-90-A-0208

We have completed our review of an allegation concerning activities at Millstone Unit 2 (RI-90-A-0208). As requested in your transmittal letter dated November 27, 1990, our response does not contain any personal privacy, proprietary, or safeguards information. The material contained in this response may be released to the public and placed in the NRC Public Document room at your discretion. The NRC letter and our response have received controlled and limited distribution on a "need to know" basis during the preparation of this response. Based upon our request on December 20, 1990, Region I personnel extended the due date for RI-90-A-0208 to January 21, 1991. Additional time was needed to resolve technical issues in order to provide a complete response.

9104250199 910417  
FDR ADOCK 05000336  
F FDR

Mr. E. C. Wenzinger, Chief  
U. S. Nuclear Regulatory Commission  
AO9166/Page 2  
January 21, 1991

#### Issue

Maintenance (weld repairs) was performed on "MSRs" on Saturday, November 10, 1990. The welders objected to the exclusion of QSD as it was their opinion that the repairs were governed by the ASME Code. The welders were directed to proceed. Later QSD determined that ASME Section VIII was applicable. The Maintenance Supervisor ignored QSD, and the repairs continued to completion without an NCR or QSD involvement.

#### Background

The welding issue identified in this allegation concerns seal welding that was performed on the leaking manway covers of the moisture separator reheaters (MSRs). The MSRs are ASME Section VIII pressure vessels. The seal welds were applied to stop steam leakage from the gasket joint of the manways.

The ASME Section VIII Code does not address in-service repairs to pressure vessels as a separate and distinct part of the Code. These types of repairs are normally classified as temporary repairs by our procedures. The reason these types of repairs are classified as temporary repairs is because the repair does not fully meet all Code requirements. Typically, this is due to operational restrictions (i.e., unisolable water or steam leakage which is present while the repair is being made).

While not addressed by the Code, these types of repairs are allowed by our procedures and are consistent with the guidelines established for making similar repairs to ASME Class 3 systems that are governed by the Code requirements of the ASME Section XI Repair Replacement Program. In some cases, these repairs require the processing of a nonconformance report (NCR) prior to the initiation of the repair. In other cases, repairs are completed in accordance with a maintenance procedure and an NCR is not required.

Additionally, the welds in question are not structural welds. No credit is taken for the structural integrity of the weld. The weld was made to stop leakage of a gasketed manway and does not have any adverse effect on the structural integrity of the pressure vessel.

With these points clarified, the following responses are provided to the questions raised by this issue.

1. What were the governing procedures for this work and were they properly prepared and implemented?

#### Response

The procedures governing the welding performed on the MSR manways were Maintenance Procedures MP-2701W and WPS 033.

Mr. E. C. Wenzinger, Chief  
U. S. Nuclear Regulatory Commission  
AO9166/Page 3  
January 21, 1991

Maintenance Procedure MP-2701W provides instructions for writing, processing, and close out of work order packages issued by the Millstone Unit 2 Maintenance Department. In accordance with the guidelines specified in this procedure, a two-page work order package was assembled and processed to authorize this work. Per this procedure, no weld inspection plan is required to implement weld repairs of this nature unless specifically required by an engineering evaluation or a nonconformance report (NCR).

In this case, the nature of the repair did not require a nonconformance report to be generated, and the engineering evaluation did not require the use of a weld inspection plan. The entire repair process was completed in accordance with the identified procedures.

2. Were Code requirements required, included, and implemented?

Response

As previously stated, Section VIII of the ASME Code does not address weld repairs to in-service vessels separately from construction requirements. There are no specific ASME Code requirements applicable to this type of repair. Our procedures specified that the identified welds be made by qualified welders, using a qualified weld procedure specifically intended for use in this type of application. No credit is taken for the structural integrity of the seal welds. The sole purpose of these welds is to prevent leakage.

3. Was QSD consulted and were their comments answered?

Response

The guidelines provided by Maintenance Procedure MP-2701W do not require an inspection plan for this type of repair. On this basis, no QSD involvement was identified in order to complete the repair.

QSD noted the weld repairs in progress and questioned the need for an NCR since the work was being performed on an ASME vessel. These comments were addressed by the Maintenance welding engineer. References were made to the guidance provided by Maintenance Procedure MP-2701W and the applicability of WPS 033. An NCR was generated to document and disposition these concerns on Code applicability.

4. Were any procedures violated regarding this work item? Please explain.

Response

Maintenance Procedure MP-2701W, Work Order Processing, and ACP-QA-2.18, ASME Section XI Repair/Replacement Program, were the procedures referenced to implement the subject repairs. The requirements and guidance provided

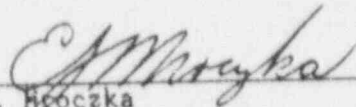
Mr. B. C. Wenzinger, Chief  
U. S. Nuclear Regulatory Commission  
A09166/Page 4  
January 21, 1991

by these procedures were followed. No procedures were violated during the repair process. As a result of this issue, we are reviewing our maintenance welding practices to ensure that they fully considered construction Code requirements prior to the initiation of work. If considered necessary, the applicable procedures will be revised to provide additional guidance on when an NCR is needed prior to the initiation of work. This review is expected to be completed by July 1991.

After our review and evaluation, we find that this issue does not present any indication of a compromise of nuclear safety. We appreciate the opportunity to respond and explain the basis for our actions. Please contact members of my staff if there are any further questions on this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
E. J. Broczka

Senior Vice President

cc: W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3