

Northeast
Utilities System

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Northeast Utilities Service Company
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September 30, 1994

Docket No. 50-423
B14995

Re: 10CFR50.55a(a)(3)

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

Millstone Nuclear Power Station, Unit No. 3
Request to Use Alternatives to ASME Code Section XI

The purpose of this letter is for Northeast Nuclear Energy Company (NNECO) to request the use of an alternative to the ASME Boiler and Pressure Vessel Code Section XI for Millstone Unit No. 3 pursuant to the provisions of 10CFR50.55a(a)(3). Specifically, NNECO requests approval to use the provisions of Code Case N-416-1, "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2 and 3, Section XI, Division 1" and Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems, Section XI, Division 1."

During the upcoming Millstone Unit No. 3 outage, NNECO will be making code repairs to Section XI components. These code repairs require that a Section XI hydrostatic test be performed. Code Case N-416-1 allows that a system leakage test be performed in lieu of a hydrostatic pressure test when Section XI code repairs are made, provided certain requirements, as specified in the Code Case, are met.

In addition, this is Millstone Unit No. 3's final refueling outage in the first ten-year inservice inspection interval and several ten-year system hydrostatic tests are currently scheduled for completion. Code Case N-498-1 allows that certain pressure/leakage tests may be performed in lieu of ten-year system hydrostatic tests, provided certain additional requirements, as specified in the code case, are met.

The performance of these hydrostatic tests, as currently required by the Code, would result in a substantial hardship to the plant in the form of additional expenditures of funds to perform the tests and additional radiation exposure to the individuals involved in

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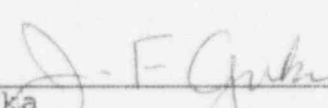
the tests without realizing a commensurate gain in safety. The issuance of these Code Case revisions by the ASME, with NRC acceptance, provides the basis for the approval of the alternatives which have been determined by the ASME consensus process to provide an acceptable level of quality and safety.

NNECO is aware that the NRC is in the process of approving these Code Cases and will be incorporating them, when possible, into Regulatory Guide 1.147. NNECO has recently learned that these Code Cases may not appear in the next revision of Regulatory Guide 1.147 as was anticipated. This unforeseen delay has a significant impact for Millstone Unit No. 3, since Millstone Unit No. 3 is currently scheduled to enter an outage in April 1995 and wishes to use these Code Cases. Therefore, approval is requested by February 1, 1995. If the NRC should publish Regulatory Guide 1.147 or some similar document which will allow NNECO to use these Code Cases, no additional correspondence would be needed from the NRC.

If you should have any questions on this request, please contact Mr. R. G. Joshi at (203) 440-2080.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: T. T. Martin, Region I Administrator
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos.
1, 2, and 3