

NORTHEAST UTILITIES



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

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March 12, 1984

Docket No. 50-336
A03233

Director of Nuclear Reactor Regulation
Attn: Mr. J. R. Miller, Chief
Operating Reactors Branch #3
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

- References: (1) R. A. Clark letter to W. G. Council, dated May 4, 1983.
(2) NRC Region I Inspection Report No. 50-336/83-03.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Code Relief Request for Testing Safety
Injection Tank Outlet Check Valves

Reference (1) requested Northeast Nuclear Energy Company (NNECO) "to investigate means of satisfying full-stroke test requirements and improving part stroke testing of Safety Injection Tank outlet check valves 2-SI-215, -225, -235, -245, and appropriately revise your Code relief request". This item was also listed as Followup Item 50-336/83-03-02 in Reference (2).

During the recently completed refueling outage, testing was conducted to determine the best stroke test which could safely be conducted on these valves. Previous stroke testing had been conducted at a flow rate of 20 GPM during cold shutdowns. It was found that optimum stroke testing was achieved by making a reduced pressure, controlled discharge of the Safety Injection Tanks to the Reactor Coolant System while the reactor vessel head was removed. This test does not result in full design rates, thus "full stroke" of the valve is not assured. However, the flow rate achieved (4000 GPM, 16 feet per sec) is considered adequate to assure the valve will fully open when needed.

NNECO's review of testing previously done during cold shutdown (20 GPM flow rate) indicates this test does not move the valve disc sufficiently to warrant its continuation. Consequently, suspension of this testing is warranted.

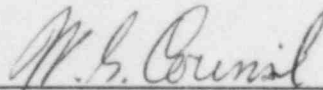
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Pursuant to 10CFR50.55a(g)(6), NNECO requests relief from the specific requirements of the applicable ASME inservice inspection requirements for valves 2-SI-215, 225, 235 and 245. Attachment 1 is a revised relief request for these valves. Your prompt action on this relief request will be appreciated.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

A handwritten signature in cursive script, appearing to read "W. G. Counsil", is written over a horizontal line.

W. G. Counsil
Senior Vice President

Attachment

ATTACHMENT 1

Revised Relief Request
Inservice Test Program
Millstone Unit 2

System: Safety Injection

Valves: 2-SI-215, 225, 235, 245

Category: C

Class: 1

Function: Prevent Reactor Coolant System backflow into the Safety Injection Tank.

Test Requirement: Exercise (full stroke) quarterly.

Bases for Relief: Valves cannot be full stroke exercised during reactor operation, cold shutdown, or refueling since no flow path exists which can accept full design flow. Valves cannot be effectively part-stroke tested during reactor operation or cold shutdown since there is no flow path which allows significant flow through the valve. Further, if this valve fails to properly reseal only single valve isolation would exist between the reactor coolant system and the lower pressure safety injection tank.

Alternate Testing: Valve will be part-stroke tested at high flow rates during refueling outages.