

NORTHEAST UTILITIES



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

General Offices • Selden Street, Berlin, Connecticut

P.O. BOX 270
HARTFORD, CONNECTICUT 06141-0270
(203) 665-5000

September 18, 1985

Docket No. 50-423
B11710

Director of Nuclear Reactor Regulation
Attn: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Millstone Nuclear Power Station, Unit No. 3
Request for Exemption from ASME Code
Requirements for Radiographic Inspections

Reviews conducted by Northeast Nuclear Energy Company (NNECO) and the NRC of radiographs supplied by TUBECO, specifically those supplied for sections of the Containment Recirculation Spray System (RSS) which are embedded in the containment floor, have resulted in several concerns relative to radiograph quality and possible indications. To resolve these concerns, NNECO has undertaken the following actions:

- 1.) Conducted an exhaustive document search to investigate the materials of construction, fabrication methods employed, and tests and inspections performed;
- 2.) Performed a piping stress analysis on the embedded sections using faulted conditions;
- 3.) Characterized all suspect indications and poor quality radiographs by visually inspecting the inner surface of the embedded pipe, reviewing the radiographs, and having discussions between the NNECO and Stone & Webster NDE Level III personnel;
- 4.) Performed a fracture mechanics evaluation of the embedded portion of pipe to assess the effect of potential flaws on the system operability; and
- 5.) Performed additional radiography and ultrasonic examinations of the suspect encapsulation welds.

Details on each of the above actions are provided in the attached engineering evaluation report. Based on this evaluation, NNECO concludes that the RSS embedded piping meets the intent of Section III of the ASME Code for Class 2 piping and will function as originally designed. However, due to the noncompliances identified, (i.e. poor quality and missing radiographs) the ASME N-5 certification cannot be issued. Therefore, pursuant to 10CFR50.55a (a)(3),

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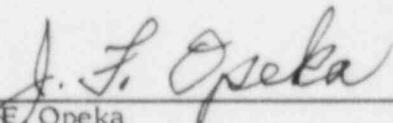
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we request that the RSS embedded piping and encapsulation be exempt from the ASME III, Class 2 requirements for radiography. The justification for this request is provided in the attached engineering evaluation report.

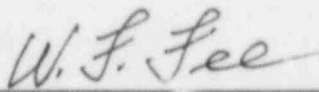
Due to our need to resolve this matter prior to the November 1, 1985 fuel load date, we request that you review and approve this submittal by October 1, 1985.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY
et. al.
BY NORHTEAST NUCLEAR ENERGY COMPANY
Their Agent



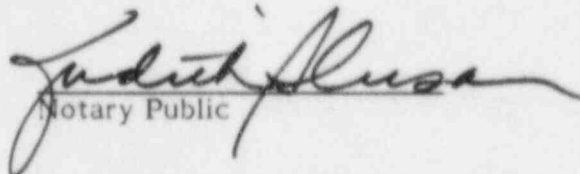
J. F. Opeka
Senior Vice President



By: W. F. Fee
Executive Vice President

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me W. F. Fee, who being duly sworn, did state that he is Executive Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.



Notary Public

My Commission Expires March 31, 1988