

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 • Seiden Street, Berlin, Connecticut

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

July 29, 1985

Docket Nos. 50-213

50-336

50-423

B11617

Director of Nuclear Reactor Regulation
Attn: Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: (1) H. L. Thompson Generic Letter 85-02 to All PWRs, dated
April 17, 1985.

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 2 and 3
Comments on Draft NUREG-0844
Steam Generator Tube Integrity

In Reference (1) the Staff provided NUREG-0844, "NRC Integrated Program for the Resolution of Unresolved Safety Issues A-3, A-4 and A-5 Regarding Steam Generator Tube Integrity" as a draft report for comment. Accordingly, Connecticut Yankee Atomic Power Company and Northeast Nuclear Energy Company hereby provide the following comments concerning NUREG-0844.

2.2 Steam Generator Tube Inservice Inspections

2.2.1 Supplemental Tube Inspections

It is not necessary to expand an ECT inspection to 100 percent after finding a single defective tube or finding 5 percent of the inspected tubes to be degraded. The current stepwise progression from the initial three percent sample to intermediate sample sizes, before performing a 100 percent inspection, ensures that those steam generators with severely degraded tubes receive adequate inspection, while those with isolated cases of degradation are spared the unnecessary expense and radiation exposure of performing a 100 percent inspection.

The need to inspect other steam generators, after finding C-2 category tubes, should be a decision made on a plant-by-plant basis since it may be possible to isolate a particular mode of degradation to a single steam generator.

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2.2.3 Denting Inspections

Inspections for denting should be limited to tubes adjacent to those tubes that will not pass a standard eddy current probe corresponding to given level of hoop strain, or those tubes that exhibited high hoop strain based on profilometer measures.

The conditions which lead to denting are generally well understood and, accordingly, plants can take corrective action to minimize denting and supplemental inspections can take into account the particular denting phenomenon in question.

2.5 Secondary Water Chemistry Program

The secondary water chemistry guidelines in SGOG EPRI-NP-2704 are an effective means for preventing steam generator corrosion. However, due to variation in design, equipment and age, all plants will vary in their ability to adopt and meet every parameter recommended by SGOG. INPO audits of plant chemistry programs provide an added level of assurance that a proper program is being utilized.

2.6 Condenser Inservice Inspection

With a strict secondary water chemistry program in place, this requirement is not necessary. The need and feasibility for a condenser inspection should be a plant decision made on an economic basis.

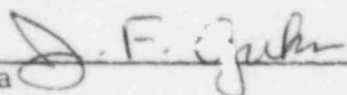
2.8 Primary to Secondary Leakage Limits

The STS limits for primary to secondary leakage are not necessarily applicable to all plants. The limits are based on W tubes, but are even more conservative for smaller CE tubes. Test data have shown that a leakage exceeding the 0.5 gpm limit (in the smaller tubes) is acceptable and does not affect tube integrity, even at pressures well in excess of accident conditions.

We trust you will find the above comments helpful in finalizing the draft NUREG.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President

cc: Mr. Emmett Murphy
Operating Reactors Assessment Branch