

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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December 16, 1985

Docket No. 50-336
B11916

Director of Nuclear Reactor Regulation
Attn: Mr. Ashok C. Thadani
PWR Project Directorate No. 8
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

- References: (1) J. F. Opeka letter to E. J. Butcher, dated June 27, 1985.
(2) J. F. Opeka letter to E. J. Butcher, dated August 30, 1985.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 2
Inservice Inspection and Testing Program
Supplemental Relief Request Information

In References (1) and (2) Northeast Nuclear Energy Company submitted the Inservice Inspection Program and associated relief requests for the second ten-year inspection interval of Millstone Unit 2. Since that submittal, operating experience has identified the need for additional relief from inservice testing requirements for two valves, pursuant to 10CFR50.55a(g).

Valve 2-FW-5A and 2-FW-5B, the Main Feed System check valves at the containment penetration, cannot be tested in accordance with the ASME Boiler and Pressure Vessel Code, Section II requirements. In addition to operational interference with testing requirements previously identified in Reference (1), it has recently been identified that the valve obturator is not attached to the valve operator. Thus the alternative testing specified in Reference (1) does not provide assurance that the valve obturator will close promptly on cessation or reversal of flow. There is no means of testing the valves that will meet the ASME Code requirements. The attached, supplemental relief request recognizes this and identifies that, in addition to valve operator testing, valve obturator freedom of movement will be verified by periodic valve disassembly.

Pursuant to the requirements of 10 CFR 170.12(c), enclosed is the application fee of \$150.00. We trust you will find this information satisfactory.

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PDR ADOCK 05000336
Q PDR

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

ADD: PWR - B/BC's TECH SUPPORT

AD - D. CRUTCHFIELD (Ltr only)
EB (W. JOHNSTON)
RSB (THOMAS)
EICS (PARR)
FOB (W. REGAN)

J. F. Opeka
Senior Vice President

Rec'd w/o check

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RELIEF REQUEST BASIS

SYSTEM: FEEDWATER

1. Valve: 2-FW-5A, 5B

Category: BC

Class: 2

Function: Prevent backflow in main feedline to No. 1
steam generator.

Test Requirement: Exercise (full stroke) for operability
every three months. Take stroke time
measurements per IWV-3410. Test for fail
safe operation.

Basis for Relief: Valve exercise during plant operation would
require stopping feed flow to the steam
generator with consequent plant shutdown.
Valve has no part stroke capability. Valve
operator is not connected to obturator.
Obturator cannot be exercised during cold
shutdown or refueling.

Date: November 29, 1985

Revision: 1

Alternate Testing:

Exercise valve operator, measure stroke
time and fail-safe test during cold shutdown.
Disassemble one valve each inspection
period to verify obturator freedom of
movement.

Valve Number	Class/ Category	Feedwater 25203-26126, Sh. 4	Size (Inches)	Valve Type	Actuation	Normal Position	Test Requirements	Relief Requests	Testing Alternative
2-FW-5A	2BC	Feedwater to S.G. 1	18	STOP CK	AO	O	Q FT	X X	QCS* FTCS*
2-FW-5B	2BC	Feedwater to S.G. 2	18	STOP CK	AO	O	Q FT	X X	QCS* FTCS*
2-FW-7	3C	Steam Aux. pp. Discharge	6	CK	-	C	Q	X	QCS
2-FW-8A	3C	Aux. pp. A Discharge	4	CK	-	C	Q	X	QCS
2-FW-8B	3C	Aux. pp. B Discharge	4	CK	-	C	Q	X	QCS
2-FW-12A	2BC	Aux. Feedwater to S.G. 1	6	STOP CK	AO	C	Q FT	X X	QCS FTCS
2-FW-12B	2BC	Aux. Feedwater to S.G. 2	6	STOP CK	AO	C	Q FT	X X	QCS FTCS
2-FW-32A	3C	Aux. FW Pump A Recirc. Check	1.5	CK	-	C	Q		
2-FW-32B	3C	Aux. FW Pump B Recirc. Check	1.5	CK	-	C	Q		
2-FW-33	3C	Terry Aux. FW Pump Recirc. Check	1.5	CK	-	C	Q		
2-FW-43A	3B	Aux. FW Reg. Valve to No. 1 S.G.	4	GL	AO	C	Q		
2-FW-43B	3B	Aux. FW Reg. Valve to No. 2 S.G.	4	GL	AO	C	Q		
2-FW-44	3B	Aux. FW Pump Dis. Cross Tie	6	GA	MO	C	Q		
2-FW-56A	3B	Aux. FW Reg. Valve Bypass	6	GA	H	C	Q		
2-FW-56B	3B	Aux. FW Reg. Valve Bypass	6	GA	H	C	Q		

*Disassemble one valve per period to verify obturator freedom of movement.