



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

August 31, 2000

10 CFR 50.55a

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of) Docket No. 50-327
Tennessee Valley Authority) 50-328

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2 - AMERICAN SOCIETY OF
MECHANICAL ENGINEERS (ASME) SECTION XI INSERVICE TESTING PROGRAM
REQUEST FOR RELIEF RV-1

The purpose of this letter is to request relief from ASME Section XI Code Requirements, OM Standard, Part 10 Paragraph 4.3.2.4(c). These ASME requirements are associated with relief request (RV-1) that was originally approved by NRC for SQN in a letter dated March 20, 1996. In accordance with 10 CFR 50.55a(a)(3), TVA is proposing an alternative to the code requirements for RV-1 that would alter the stated time at which the valves are disassembled and inspected from "during refueling outages" to "once per fuel cycle." This would allow online disassembly and inspection of these valves.

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The enclosed relief request is the same as a relief request PV-13) approved for TVA's Watts Bar Nuclear Plant (WBN) by NRC letter dated June 9, 2000. TVA and NRC agreed this was an acceptable approach during a July 27, 2000, telecon, once it was recognized that the Risk Informed Inservice Testing Relief Request (April 27, 2000) was unlikely to be approved in time to support SQN's Unit 2 Cycle 10 (U2C10) refueling outage. Both a condition monitoring and the WBN approach to relief were discussed at that time. TVA chose the WBN approach to facilitate a more timely TVA submittal and NRC review.

This relief request is needed to support SQN's U2C10 refueling preoutage activities. This outage is scheduled to begin October 22, 2000. If you have any questions about this change, please telephone me at (423) 843-7170 or J. D. Smith at (423) 843-6672.

Sincerely,



Pedro Salas
Manager, Site Licensing
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Enclosures

cc (Enclosures):

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ENCLOSURE

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 and 2

REQUEST FOR RELIEF RV-1

I. **Relief Request Number** - RV-1, Revision 1

Executive Summary - Relief is being requested to allow disassembly and inspection of the containment spray header check valves and the residual heat removal spray header check valves on a sampling basis, in accordance with the provisions of Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," Minutes of the Public Meetings on Generic Letter 89-04 dated October 15, 1989, Position 2, "Alternative to Full Flow Testing of Check Valves." Use of the polar crane is impacted by the presence of the extensive scaffolding necessary to reach these four valves. During outages, use of the polar crane often becomes a critical path or near critical path item. Therefore, relief is also being requested from performing the valve disassembly "during the refueling outage" to "once per fuel cycle" in order to avoid conflicts with scheduling and use of the polar crane.

II. **Affected Unit(s)/System(s)** - Units: Units 1 and 2
Systems: Containment Spray

III. **Affected Component(s)** - CKV-72-547
CKV-72-548
CKV-72-555
CKV-72-556

IV. **ASME Code Class** - 2

V. **Category** - C-Active

VI. **Function of Affected Component(s)** - Opens to pass water from either the containment spray or the residual heat removal (RHR) pumps to the Containment Spray or RHR ring headers and closes to provide inboard containment isolation.

VII. **Impractical Requirement** - OM Standard, Part 10, Paragraph 4.3.2.4(c) - "As an alternative to the testing in (a) or (b) above, [OM Standard, Part 10, Paragraph 4.3.2.4(a) and 4.3.2.4(b)] disassembly every refueling outage to verify operability of check valves may be used."

VIII. **Basis for Granting Relief** - Exercising valves CKV-72-547, CKV-72-548, CKV-72-555, CKV-72-556 with water will result in deluging the containment area with borated water, introducing an unnecessarily hazardous problem with a high potential for physical damage to auxiliary equipment and unreasonably prolonged cleanup efforts. Part stroke exercising with air during operation introduces the potential of inadvertently causing a unit trip, safety system actuation, phase B containment isolation, and containment spray actuation by exceeding the high-high containment pressure set point due to the pressure rise caused by the volume of air blown into containment during testing of the check valves. Exercising in conjunction with cold shutdowns is impractical due to the length of time required to construct the scaffolding necessary to obtain access to the valves and to drain and refill the piping from the test point to the check valves. Disassembly of all four valves each refueling outage is an excessive burden.

The valves are located in the containment dome. Obtaining access to the valves requires construction of extensive scaffolding on top of the polar crane bridge. During refueling outages, the polar crane is frequently required to support various outage activities. However, the presence of the scaffold used to obtain access to these check valves restricts operation of the crane in support of other outage related activities. This restriction has the very real potential of extending outage duration. Therefore, pursuant to 10 CFR 50.55a(a)(3)(ii), it is requested that relief be granted.

IX. **Proposed Alternative** - Group the valves into groups not larger than four with all valves in each group being identical in: design, material, manufacture, environment (including physical orientation and radiological conditions), and function. Disassemble and inspect one valve from each group in accordance with the provisions of Generic Letter 89-04, Position 2 once per fuel cycle. This allows the option to perform this inspection online at a refueling cycle interval and not necessarily during refueling outage. If any single valve is found unacceptable, all valves in the associated group will then be disassembled and inspected.

X. **Frequency of Proposed Alternative** - Disassemble and inspect one valve per group once per fuel cycle interval in accordance with Generic Letter 89-04, Position 2, but not necessarily during the refueling outage, to verify its continued operability.

XI. **Conclusion** - SQN's Inservice Test Program contains an NRC approved relief request RV-1 that requires disassembly and inspection of the containment spray check during refueling outages. TVA is proposing a change to RV-1 to modify the frequency associated with the disassembly and inspection of these valves each outage. TVA's proposed change to RV-1 would allow disassembly and inspection to be performed outside the refueling outage window. The change would modify the frequency from "during refueling outages" to "once per fuel cycle." Testing would continue to remain within the same fuel cycle interval and would continue to be scheduled on a rotating basis. The basis for relief is hardship associated with schedule impacts caused by restrictions imposed on the polar crane use while the scaffolding necessary to reach these valves is installed on the polar crane bridge. Accordingly, TVA's request for relief is submitted in accordance with 10 CFR 50.55a(a)(3)(ii).