



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37384-2000

March 30, 2001

10 CFR 50.55a(a)(3)(i)

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

Gentlemen:

In the Matter of ) Docket Nos. 50-327  
Tennessee Valley Authority ) 50-328

**SEQUOYAH NUCLEAR PLANT (SQN) - WITHDRAWAL OF REQUEST FOR RELIEF FROM AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) CODE REQUIREMENTS - RISK INFORMED INSERVICE TEST (RI-IST) PROGRAM (TAC NOS. MA9097 AND MA9098)**

Reference: TVA letter to NRC dated April 27, 2000, "Sequoyah Nuclear Plant (SQN) - Request for Approval of Relief from American Society of Mechanical Engineers (ASME) Code Requirements - Request for Relief RI-IST-1 - Risk Informed Inservice Testing - Valves"

By the referenced letter, TVA provided a request for relief to implement a RI-IST program for 160 ASME Section XI valves at SQN. TVA's request proposed alternative test intervals for valves that were selected as good test performers and low maintenance valves. Following discussions with the NRC staff regarding continued review of the proposed RI-IST program, TVA has decided to withdraw the subject relief request for SQN at this time.

TVA's proposed RI-IST program was a limited scope program that was based on a qualitative and quantitative approach coupled with risk-informed evaluations of SQN's Probabilistic Safety Assessment (PSA) and Maintenance Rule Program data. Following initial NRC review of the referenced request, the staff indicated to TVA that additional information would be

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required to complete staff review. Specifically, additional information would be needed by the staff that would address certain elements of the regulatory guidance contained in NRC Regulatory Guide (RG) 1.174, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing" and RG 1.175, "An Approach for Using Probabilistic Risk Assessment In Risk Informed Decisions On Plant-Specific Changes to the Licensing Basis."

TVA has evaluated revising SQN's submittal to address the additional information and has determined that due to the uncertainties associated with this unprecedented approach and the additional costs needed to resolve NRC questions, TVA is withdrawing the subject submittal at this time.

TVA appreciates the staff's assistance in the review of the reference letter.

If you have any questions about this change, please telephone me at (423) 843-7170 or J. D. Smith at (423) 843-6672.

Sincerely,

A handwritten signature in black ink, appearing to read "Pedro Salas", with a large, sweeping flourish underneath.

Pedro Salas  
Licensing and Industry Affairs Manager  
Sequoyah Nuclear Plant

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PS:JDS:DVG:SJM

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