



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

March 2, 2004

10 CFR 50.55a(g)(4)(iv)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of)	Docket Nos. 50-327
Tennessee Valley Authority)	50-328
		50-390

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2, AND WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION (ISI) PROGRAM - REQUEST TO USE SUBSEQUENT EDITION AND ADDENDA OF ASME SECTION XI FOR QUALIFICATION OF ALTERNATIVE VT-2 EXAMINATION PERSONNEL

Subject to NRC approval, 10 CFR 50.55a(g)(4)(iv) permits the use of portions of subsequent editions and addenda of the ASME Section XI Code which have been incorporated by reference in paragraph (b) of that section, for inservice examination of components and system pressure tests. In accordance with the provisions of 10 CFR 50.55a(g)(4)(iv), TVA is requesting approval to adopt the requirements for alternative qualification of VT-2 (visual) examination personnel specified in the 1998 Edition of the ASME Section XI Code, subarticle IWA-2316, for observation of leakage during ASME Class 1, 2, and 3 system pressure tests for SQN Units 1, 2, and WBN Unit 1. The use of the 1998 Edition of the Code was approved in the *Federal Register* notice dated September 26, 2002 and made effective October 28, 2002 (See 67 FR 60520).

IWA-2316 is a described alternative to the other requirements for the qualification of VT-2 examination personnel in the Section XI articles. Therefore, the embedded vision test requirements (IWA-2321, IWA-2322, and Table IWA-2322-1) are the only other related requirements, from the 1998 Edition, which are associated with

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IWA-2316 and will be adopted, upon approval, for use with the qualification of the alternate VT-2 examiners. In keeping with these related requirements, TVA qualifies alternate VT-2 examination personnel through the task qualification process, which meets and documents the requirements of subarticle IWA-2316 and includes a written examination. In addition, annual visual acuity examinations for each individual are tracked by TVA and are required to maintain examiner qualification. These training and qualification records are also maintained in a manner which allows them to be retrieved and reviewed.

The alternative VT-2 qualified personnel will be used for performance of VT-2 (visual) examinations and not for other administrative functions performed by certified non-destructive examination (NDE) personnel. TVA intends to limit the performance of the VT-2 examinations by alternate VT-2 qualified examiners to system leakage tests or hydrostatic tests on fluid systems for Section XI Code required examinations in accordance with the limitations currently imposed in 10 CFR 50.55a(b)(2)(xviii)(B). Examiners qualified under the alternate VT-2 provisions of subarticle IWA-2316 will not be used to perform gas leakage or bubble tests for ASME Section XI Code credit.

TVA, in general, performs NDE in accordance with the processes and criteria of the 1995 Edition through the 1996 Addenda of the Code. In addition, TVA also currently uses the provisions of N-546 and the conditional requirements in Regulatory Guide 1.147 to perform VT-2 visual examinations during ASME Code class system pressure tests. This request seeks permission to use the alternative VT-2 provisions of the Section XI paragraph IWA-2316 of the 1998 Edition, in lieu of the N-546 provisions and RG-1.147 conditions. TVA will apply this alternative for the timeframe through the end of the current ISI interval for each of the SQN and WBN units. The SQN Units 1 and 2 ISI Programs are in their second 10-year ISI interval, which is currently planned to end December 15, 2005. WBN Unit 1 is currently in its first ISI interval which ends December 31, 2006.

TVA requests approval to use the IWA-2316 portion of the 1998 Edition as soon as possible to support the conduct of ongoing system pressure tests. Note that a similar request for the Browns Ferry Nuclear Plant Units was submitted by TVA letter dated September 26, 2003 and subsequently approved by the NRC letter dated January 14, 2004 (TAC Nos. MC0879, MC0880, and MC0881).

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There are no new regulatory commitments in this letter. If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,


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