



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

O. J. "Ike" Zeringue  
Senior Vice President, Nuclear Operations

**JUN 29 1995**

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - 10 CFR 50.55a(a)(3) -  
PROPOSED ALTERNATIVE TO THE TESTING REQUIREMENTS OF SECTION XI, OF  
THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND  
PRESSURE VESSEL CODE

The purpose of this letter is to request NRC authorization to waive the requirements for testing the pressurizer safety valves within six months of initial fuel load. The 1989 Edition of ASME Section XI invokes ANSI/ASME Operations and Maintenance (OM) Standard, 1987 Edition with Addenda through 1988a, Part 1 for "Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices." Paragraph 7.2.1.1, "Safety Valves," requires each ASME Class 1 pressure relief device have its set pressure verified within six months prior to initial fuel loading. The WBN Unit 1 pressurizer safety valves presently installed were tested in December 1994. This timeframe was established to support a second hot functional test (HFT) and be within the six-month requirement for initial fuel loading schedule at that time.

The current schedule projects the second HFT in July and a Unit 1 fuel load in September, which would result in the six-month requirement being exceeded. TVA is requesting the six months prior to fuel load requirement be waived. The subject valves will be included in the second HFT and their performance will be monitored as part of that testing. In addition, these valves are scheduled to have their set point verified during the first refueling outage. This change out is more conservative than the code requirement for a five-year rotation.

050067

9507060090 950629  
PDR ADCK 05000390  
A PDR

ADCK

JUN 29 1995

Since the valves were tested in December 1994, installed in March 1995, and will be included in the second HFT in July 1995, TVA has high confidence that the subject valves will be adequately verified to perform their intended function from the period of initial fuel load to the first refueling outage. As such TVA considers that extending the six-month set pressure requirement will provide an acceptable level of quality and safety. Furthermore, given the circumstances described, the six-month requirement would result in a hardship without a compensating increase in the level of quality and safety. Accordingly, TVA requests NRC approval, in support of our fuel load date, to extend the period of time to verify set pressure safety valves from six months to twelve months prior to initial fuel loading.

Enclosure 1 to this letter contains the commitment made by this submittal. If you have any questions, please contact P. L. Pace at (615)-365-1824.

Sincerely,

  
O. J. Zeringue

cc(Enclosure):

NRC Resident Inspector  
Watts Bar Nuclear Plant  
Rt. 2, Box 700  
Spring City, Tennessee 37381

Mr. P. S. Tam, Senior Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852

U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

ENCLOSURE

WATTS BAR NUCLEAR PLANT  
10 CFR 50.55a(a)(3)  
PROPOSED ALTERNATIVE TO SECTION XI, ASME

COMMITMENT

TVA will verify the pressurizer safety valves set points during the first refueling outage.