

August 29, 1996

Mr. Oliver D. Kingsley, Jr.
President, TVA Nuclear and
Chief Nuclear Officer
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING RELIEF FROM CERTAIN
ASME SECTION XI REQUIREMENTS FOR SNUBBERS, WATTS BAR UNIT 1
(TAC NO. M94672)

Dear Mr. Kingsley:

On February 7, 1996 the Tennessee Valley Authority requested relief from certain American Society of Mechanical Engineers Section XI inservice inspection and testing requirements for snubbers. We have identified additional information in the enclosure that we request be provided to enable the continuation of our review.

Sincerely,

Original signed by

Robert E. Martin, Senior Project Manager
Project Directorate II-3
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Docket No. 50-390

Enclosure: Additional Information

cc w/enclosure: See next page

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The Honorable Billy R. Patton
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Rhea County Courthouse
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The Honorable Garland Lanksford
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REQUEST FOR ADDITIONAL INFORMATION

ISI SNUBBER ASME CODE REQUIREMENTS/RELIEF REQUEST

CODE REQUIREMENTS

- 1) American Society of Mechanical Engineers (ASME), SECTION XI, "RULES FOR INSERVICE INSPECTION OF NUCLEAR POWER PLANT COMPONENTS" Subsubarticle IWA-1310, "COMPONENTS SUBJECT TO INSPECTION AND TESTING" specifies that components identified in this Division for inspection and testing shall be included in the inservice inspection plan.
- 2) The contents of Division 1, "Rules for Inspection and Testing of Components of Light-Water Cooled Plants," includes Subsection IWF.
- 3) Under Section XI, the Owner is assigned responsibility to develop a program to demonstrate conformance to the requirements of the Section, including development of plans and testing procedures for filing with regulatory authorities.
- 4) Subsubarticle IWF-1220, SNUBBER INSPECTION REQUIREMENTS, specifies that inservice inspection requirements for snubbers shall be in accordance with IWF-5000.
- 5) Article IWF-5000 contains Subarticles IWF-5200, "PRESERVICE EXAMINATIONS AND TESTS", IWF-5300, "INSERVICE EXAMINATIONS AND TESTS," and IWF-5400, "REPAIRS AND REPLACEMENTS." These Subarticles defer to the requirements of ASME/ANSI OM-1987, Part 4 (published in 1988) and IWF-4000 for repairs and IFW-7000 for replacements.

SUMMARY OF WATTS BAR NUCLEAR PLANT REQUEST FOR RELIEF FOR SNUBBERS FROM SECTION XI CODE REQUIREMENTS

The licensee requested relief from the requirements of Section XI, 1989 Edition, Subarticles IWF-5200, IWF-5300, IWA-2100 and Subsubarticle IWA-6230.

Further, in the licensee's basis for relief it is noted that the Code requirements "would also require special certification of inspection and test personnel and use of snubber test apparatus that would require the removal of snubbers to a test area."

The license proposes as an alternative to the Code requirements to implement the Watts Bar Nuclear Plant Technical Requirements (TR) 3.7.3, and contends the alternative provides an equal or greater level of quality and safety than the ASME, Section XI, Code requirements.

REQUESTS FOR RESPONSES TO ISSUES CONCERNING THE RELIEF REQUEST

1. Section XI, Subarticle IWF-5200, PRESERVICE EXAMINATIONS AND TESTS, requirements are not addressed in TR 3.7.3.

The requirements of Subarticle IWF-5200 should be included in TR 3.7.3, or deleted from the relief request.

2. Section XI, Subarticle IAW-2100, DUTIES OF THE INSPECTOR, includes the requirements of the duties, qualifications and access for inspectors employed by State, or Municipalities of the United States, or an Authorized Inspection Agency.

It may be implied that Tennessee Valley Authority (TVA's) position is that relief granted by the Nuclear Regulatory Commission staff for certain ASME code requirements would also be applicable to other regulatory agencies as mentioned above. Relief granted by this regulatory agency may not relieve the licensee of the requirements with regard to the other jurisdictions. This regulatory agency cannot exempt the licensee from the requirements of other jurisdictions. TVA is requested to clarify its intent in this regard.

3. Section XI, Subsubarticle IWA-6230, SUMMARY REPORT SUBMITTAL, requires the Owner, prior to commercial service to file a preservice inspection summary report, and within 90 days of the completion of the inservice inspection conducted during each refueling outage file summary reports with the enforcement and regulatory authorities having jurisdiction at the plant site.

The licensee's alternative to the Code requirements does not address preservice inspections (as noted in item 1 above). An alternative to IWA-6230 requirements should be provided, and reports required by other jurisdictions may not be governed by a regulatory relief

4. In implementing Code requirements and activities the owner is required to maintain a Quality Assurance program, in part, to envelop the responsibilities for implementing requirements, qualifying the personnel performing examination and tests, and providing procedures and instructions for complying with requirements. ASME/ANSI OM-1987, Part 4, Subparagraph 1.5.4, Personnel Qualifications, states, "Personnel who are required to witness, perform, and/or evaluate the examination and testing program shall be qualified in accordance with the Owner's administrative procedures."

TVA is requested to explain why Subparagraph 1.5.4 requires special certification of inspection and test personnel, and is not enveloped by the plant's general QA program? TVA's proposed alternative does not address this issue.

5. The requirements of ASME/ANSI OM-1987, Part 4, Subparagraph 3.2.6, Inservice Operability Testing Methods, provides requirements with regard to testing of snubbers at the installed locations and for snubber removal and testing in other areas based on practicality.

TVA is requested to provide a discussion to clarify consistency between Subparagraph 3.2.6 and the relief request statement that Part 4 requires "use of snubber test apparatus that would require the removal of snubbers to a test area. Operability testing of snubbers could not be performed in place at the snubber's location."