

April 7, 1997

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: SECOND REQUEST FOR ADDITIONAL INFORMATION REGARDING THE WATTS BAR
NUCLEAR PLANT, RELIEF REQUEST FOR SNUBBER INSPECTION REQUIREMENTS
(TAC NO. M94672)

Dear Mr. Kingsley:

By letter dated February 7, 1996, the Tennessee Valley Authority (TVA) requested relief from the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI inservice inspection and testing requirements for snubbers for the Watts Bar Nuclear Plant Unit 1. The staff requested additional information (RAI) on five items identified in NRC letter dated August 29, 1996. By letter dated December 5, 1996, TVA provided its response.

The staff reviewed the TVA RAI responses and requires additional information as discussed in the enclosure, to continue its review.

Sincerely,

Original signed by

Robert E. Martin, Senior Project Manager
Project Directorate II-3
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Docket No. 50-390

Enclosure: Request for Additional Information

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TENNESSEE VALLEY AUTHORITY

WATTS BAR NUCLEAR PLANT

DOCKET NUMBER 50-390

REQUEST FOR ADDITIONAL INFORMATION REGARDING

TECHNICAL REQUIREMENTS APPLICABILITY FOR SNUBBER INSPECTIONS

Previous requests for additional information (RAI) items regarding relief requested from the requirements of the American Society of Mechanical Engineers (ASME) Code, Section XI, the Tennessee Valley Authority (TVA) response and the staff's comments are as follows:

RAI Item 1 from Nuclear Regulatory Commission (NRC) August 29, 1996 Letter

Section XI, Subarticle IWF-5200, "Preservice Examination and Tests" requirements are not addressed in Technical Requirements (TR) 3.7.3. The requirements of the Subarticle IWF-5200 should be included in TR 3.7.3 or deleted from the relief request.

TVA Response of December 5, 1996

TVA is seeking relief from IWF-5200, "Preservice Examination and Tests" for snubbers as submitted in the relief request. Therefore, TVA cannot delete Subarticle IWF-5200 from the relief request nor can this subarticle be incorporated into TR 3.7.3. TVA is required to perform the examination and testing on repaired/replaced snubbers to establish a new preservice examination in accordance with TR 3.7.3. Under the proposed alternate examinations of TR 3.7.3, a "Preservice Examination and Test" on repair/replacement snubbers is performed under the TR Snubber Program. The site procedure for the "Snubber Program" which implements TR 3.7.3, states: "Any snubber added to a plant system, whether the result of a design change or a maintenance related replacement, must be tested per the Technical Requirements Instruction (TRI), 1-TRI-0-7 (Mechanical Snubbers) or 1-TRI-0-8 (Paul Monroe, Snubbers) prior to installation." The Alternate Examinations section of the relief request is revised as follows:

Alternative Examination

"Watts Bar Nuclear Plant will perform examination and testing of snubbers as required by TR 3.7.3, 'Snubbers.' Examination and testing of repair/replaced snubbers to establish a new preservice examination is also performed by TR 3.7.3. Examination and testing data resulting from TR 3.7.3 is maintained on site and filed in accordance with the Watts Bar work control process."

Staff Comments and RAI

The Watts Bar Nuclear Plant (WBN) Unit 1 inservice inspection (ISI) snubber program is based on the 1989 Edition of the ASME B&PV Code, Section XI, Article IWF-5000 requirements which has the following subarticles:

- IWF-5200 Preservice Examinations and Tests
- IWF-5300 Inservice Examinations and Tests
- IWF-5400 Repairs and Replacements

The subarticles refer the snubber requirements to the 1988 Addenda to ASME/ANSI OM-1987, Part 4. Part 4, titled "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)" addresses the following:

- Section 2 contains the requirements for preservice inspections conducted prior to plant commercial service,
- Section 3 contains requirements for inservice inspections conducted during refueling outages. The staff has reviewed TR 3.7.3 and has no further questions on how TR 3.7.3 addresses these inspections.

A comparison of TVA's several submittals indicates a need for clarification regarding TVA's intended request for relief. For example, does TVA, by referencing IWF-5200, request relief from the ASME Code requirements for the preservice inspection program conducted prior to commercial operation? The reference to IWF-5200 appears to suggest this, however TVA's initial request for relief, dated February 7, 1996, states that "This Request for Relief is applicable to WBN's first inspection interval which will commence at commercial operation." If the latter statement reflects TVA's intentions, the appropriate subarticle would be IWF-5300 or perhaps IWF-5400, depending on the particulars of TVA's need for relief.¹

Please provide clarification by (a) identifying the phase of plant life for which relief is sought, whether prior to or during plant commercial operation, and (b) identify the specifics of the ASME Code and related OM standard for which relief is requested. Then, please identify the specific part(s) of TR 3.7.3 that constitute the alternative to the Code and OM requirements.

RAI Item 2 from NRC August 29, 1996 letter

Section XI, Subarticle IWA-2100, DUTIES OF THE INSPECTOR, includes the requirements of the duties, qualifications and access for inspectors employed

¹ TVA's intermingling of discussion of IWF-5200 with discussion of provisions for repair & replacement of snubbers during plant operation introduces uncertainty regarding the objective of the request for relief. The staff regards IWF-5200 as being applicable to the preservice program conducted prior to initial plant operation and IWF-5300 and IWF-5400 as applicable to activities conducted following initial plant operation.

by State, or Municipalities of the United States, or an Authorized Inspection Agency.

It may be implied that TVA's position is that relief granted by the NRC 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 for other jurisdictions. TVA is requested to clarify its intent in this regard.

TVA response of December 5, 1996

TVA did not intend to imply that relief granted by the NRC for certain ASME code requirements, would be applicable to other regulatory agencies. TVA is requesting relief from ASME Section XI, Subarticles IWF-5200 and 5300, which require utilization of Authorized Nuclear Inservice Inspector (ANII) involvement in snubber examination and testing. Snubber examination and testing under the proposed alternate examination of TR 3.7.3 does not require the services of an ANII. The ANII would be involved in repairs and replacements of snubbers but not snubber examination and testing. The reference to IWA-2100 in the Code Requirements section of the relief request is revised as follows to address IWA-2100 for clarification (revised portion is underlined).

"...for snubbers be filed with the regulatory authority, and IWA-2100 requires authorized nuclear inservice inspector involvement for snubber examination and testing."

Staff Comments

No adequate basis has been provided by TVA to date for the granting of relief from any ASME Code requirements for ANI Inspection activities. Accordingly, in the absence of suitable justification, pursuant to 10 CFR 50.55a, the NRC staff does not propose to grant such relief.

RAI Item 3 from NRC August 29, 1996 letter

Section XI, Subarticle IWF-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 inspections 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.

TVA Response of December 5, 1996

The ISI summary reports required to be filed with authorities in accordance with Paragraph IWA-6230 include preservice inspections as a result of repair and replacement activities and ISIs. This is identified in Paragraph IWA-6220(d)(2) and (3). As an alternative to Paragraph IAW-6230, the TR testing data, including preservice inspections, will be filed in accordance with Watts Bar's work control process in lieu of the summary report. See revised paragraph in item 1 for alternate to IWA-6230 requirements.

Staff Comments and RAI

The response, to date, does not provide adequate basis for the granting of relief, pursuant to 10 CFR 50.55a(3), from the requirements of IWA-6230. The reference to the work control process is vague and undefined and does not include a justification for the necessity of such relief. TVA should provide suitable justification, pursuant to 10 CFR 50.55a, for this request for relief, including identification of alternate requirements in TR 3.7.3, or commit to comply with IWA-6230.