



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2881

October 14, 1999

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

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

Gentlemen:

In the Matter of)	Docket No. 50-327
Tennessee Valley Authority)	50-328
		50-390

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2, WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) - VT-2 VISUAL EXAMINATIONS DURING APPENDIX J TESTING - REVISED REQUEST FOR RELIEF

The purpose of this letter is to revise our requests for relief for SQN dated June 8, 1999 and WBN dated August 31, 1999 from specific requirements of ASME Section XI, Subsection IWE of the 1992 Edition, 1992 Addenda. Subsection IWE applies to Code Class MC (metal containment) pressure retaining components and metallic shell and penetration liners of Code Class CC (concrete containment) pressure retaining components and their integral attachments.

The SQN and WBN requests for relief, identified as CISI-2 for both plants, sought relief in accordance with 10 CFR 50.55a(a)(3)(i) to not perform VT-2 visual examinations for leakage during Appendix J leak rate tests following repair, replacement, or modification activities. Based on conversations with NRC on October 7, 1999, TVA understands that the staff wishes to pursue the technical issues surrounding request CISI-2 with the industry before taking a position on elimination of VT-2 visual examinations following repair or replacement under Subsection IWE.

Accordingly, we are revising request CISI-2 as shown in Enclosure 1 by replacing the "Alternative Examinations" section of the relief request for both SQN and WBN. TVA understands that this revised request for relief is similar to relief granted to Ginna in that the revised request for relief allows the licensee to perform a VT-1

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examination during or after completion of required leak rate tests on repaired or replaced components in lieu of a VT-2 examination during leak rate testing.

TVA has determined that the proposed alternatives would provide an acceptable level of quality and safety.

TVA requests NRC review and approval of these relief requests so that the Containment Inservice Inspection plan revisions can be completed in time to support the implementation of Containment Inservice Inspections during SQN's February 2000 refueling outage and WBN's October 2000 refueling outage. An NRC response is requested by December 1, 1999 for SQN and by April 1, 2000 for WBN in order to allow sufficient time to amend the inspection plans that implement this request.

If you have any questions concerning this matter, please telephone me at (423) 751-2508 or Everett Whitaker at (423) 751-6369.

Sincerely,


Mark J. Burzynski
Manager
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Enclosure

cc (Enclosure):

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ENCLOSURE 1

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2, AND
WATTS BAR NUCLEAR PLANT UNIT 1 REVISED REQUEST FOR RELIEF CISI-2

Replace the alternative examinations proposed in TVA submittals dated June 8, 1999 for SQN, and August 31, 1999 for WBN, with the following alternative examinations:

ALTERNATIVE EXAMINATION(S):

In those cases where TVA elects not to perform a VT-2 visual examination of repaired or replaced areas during the 10 CFR 50, Appendix J leak rate testing, a VT-1 visual examination will be performed during or following the 10 CFR 50, Appendix J leak rate testing.