

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

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DEC 24 1987

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

WATTS BAR NUCLEAR PLANT (WBN) - ASME SECTION III REQUIREMENTS FOR WELDING ACTIVITIES

A meeting was held on June 26, 1987 between NRC and TVA regarding WBN commitments to ASME Section III requirements for welding activities. The NRC to TVA letter dated July 2, 1987 transmitted the meeting summary.

The NRC staff stated its position regarding Section III welding activities at WBN as follows:

- I. All work should be performed to the Code of Record for construction, i.e., Section III-1971 through Summer 1973.
- II. TVA shall review any repairs/modifications performed following closure of the N-5 packages. If cases are identified where work was performed in accordance with Section XI or by non-stamp holder, TVA shall identify these as exceptions to the Code of Record. For these exceptions, TVA shall request approval from the NRC staff for the proposed alternatives as prescribed by 10 CFR 50.55a(a)(3).
- III. Documentation of the N-5 packages may be accomplished by supplementing the current N-5 packages. This is an acceptable method to the jurisdictional authority (NRC) for resolving nonconformances that is consistent with code interpretation III-1-83-175.

To comply with Part I of the NRC position, WBN identified in the TVA letter to NRC dated August 21, 1987, that programmatic and technical requirements of the ASME Section III Code have been applied throughout the design and construction phase at WBN. This included the Code of Record and those specific provisions of later Editions, Addenda, and Code Cases used by TVA. Any Code Case to be used at WBN that is not listed in either Regulatory Guide 1.84 or 1.85, shall be submitted to the NRC for their review prior to its use.

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WBN is developing clear and complete design and licensing documentation as to the use of specific provisions of later versions of the ASME Section III Code which have been adopted subsequent to the Code of Record (ASME Section III, 1971 Edition through and including Summer 1973 Addenda). Design criteria will be developed to control the approval and use of specific provisions of later Editions, Addenda and Code Cases. The Final Safety Analysis Report (FSAR) will then be revised as required to address the use of provisions of later ASME Section III Code versions which could be viewed as less restrictive. The design criteria will be developed and FSAR changes submitted prior to fuel load. TVA will inform the NRC of the identification and justification of any other areas in which we are currently using potentially less restrictive provisions of later ASME Section III Code versions. Transmittal of this information will be provided to you by July 1, 1988 in form similar to the previously referenced TVA to NRC letter dated August 21, 1987.

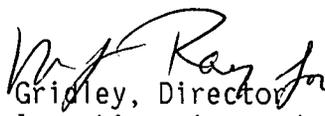
To comply with Part II, TVA is reviewing all repairs and modifications to identify work performed in accordance with Section XI. When this review is complete, exemption requests will be submitted to the NRC as prescribed by 10 CFR 50.55a(a)(3) as appropriate. The results of this effort will be submitted by March 1, 1988.

To comply with Part III of the NRC position, WBN shall document welding activities performed since closure of the N-5 data packages and future welding activities performed in accordance with the Code of Record by supplementing the appropriate N-5 data package, including documentation of any necessary exemption requests. WBN will perform repair, replacement, and maintenance activities that do not require ASME Section III accreditation, in accordance with the requirements of ASME Section XI. This is presently controlled by site Administrative Instruction AI-9.15.

In summary, WBN will comply with the NRC position on ASME Section III by implementing the listed actions. If there are any questions, please contact D. A. Kulisek at (615) 365-8761.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

cc: See page 3

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