

TENNESSEE VALLEY AUTHORITY

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APR 25 1989

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

Gentlemen:

In the Matter of the Application of)
Tennessee Valley Authority)

Docket Nos. 50-390
50-391

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION III REQUIREMENTS FOR WELDING ACTIVITIES

NRC's position, provided in a letter to TVA dated July 2, 1987, stated that ASME welding activities at WBN should be performed to the Construction Code of Record, ASME Section III-1971 Edition through Summer 1973 Addenda. TVA responded October 3, 1988, that TVA realigned the WBN welding program to require that welding activities affecting ASME code systems be performed in accordance with the Construction Code of Record. The requirements for the performance of those activities were incorporated into Site Director Procedure Administrative Instruction (AI)-9.15 and became enclosure 1 to the October 3, 1988, letter.

To allow the maintenance organization greater flexibility in controlling their work, AI-9.15 is being revised (enclosed). This revision will still control work activities within the scope of NRC's requirement for welding activities to the Construction Code of Record. The asterisks in the left margin identify the revised paragraphs.

Since this is the first revision since the October 3, 1988, letter, TVA believes they have a responsibility to notify you of the change. Future revisions that may be necessary will be made available through controlled copies of the site director procedures at WBN.

Enclosure 2 lists the commitments contained in this report.

WBN will proceed with the use of this revised procedure. If there are any questions, please telephone G. R. Ashley at (615) 365-8527.

Very truly yours

TENNESSEE VALLEY AUTHORITY


C. H. Fox, Jr., Vice President and
Nuclear Technical Director

Enclosures
cc: See page 2

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT PERFORMANCE OF ASME CODE ACTIVITIES ON UNIT 1

To comply with NRC's position, American Society of Mechanical Engineers (ASME) code activities for WBN unit 1 are being handled in accordance with the requirements described below. These requirements have been incorporated into Site Director Procedure Administrative Instruction (AI)-9.15. Activities within the scope of ASME Section III must be performed by a stamp holder organization in accordance with TVA's "Quality Assurance Manual for ASME Section III Nuclear Power Plant Components" (NCM). Activities outside the scope of ASME Section III but within the scope of ASME Section XI may be performed by a nonstamp holder organization. These activities are being performed and documented in accordance with the Nuclear Quality Assurance Manual as implemented by the WBN Section XI Repair and Replacement Program.

1.0 Purpose

The purpose of this specification is to describe:

- (1) those work activities that may be performed by plant organizations not possessing ASME code accreditation (nonstamp holder); and
- (2) those activities that must be performed by organizations which possess appropriate ASME code accreditation (stamp holder).

2.0 Scope

This specification applies to all work performed on ASME code class components or piping systems on unit 1 before issuance of the operating license.

3.0 References

- 3.1 TVA's letter to NRC dated December 5, 1986, Docket Nos. 50-390/391 (L44 861205 800)
- 3.2 TVA's letter to NRC dated December 16, 1986, Docket Nos. 50-390/391 (L44 861216 800)

4.0 Definitions

- 4.1 Repair - Those operations involving welding, heat treatment, or defect removal which are required to restore an item to a safe and satisfactory operating condition.
- 4.2 Modification - A planned change in plant design or operation, accomplished in accordance with the requirements and limitations of applicable codes, standards, specifications, licenses, and predetermined safety restrictions.

- 4.3 Replacement - Spare and renewal components or pressure retaining parts of a component, such as valve body, disc, and body-to-bonnet bolting. Replacement does not alter the design or operation of a component or piping system.

For the purpose of this specification, the term replacement shall also apply where attachment to the pressure boundary is by welding or mechanical means.

5.0 Requirements

- 5.1 The following kinds of activities must be performed by organizations possessing ASME Section III accreditation:

- * 5.1.1 All repairs by welding or heat treatment (see Section 4.1) of pressure retaining portions of TVA components or piping systems.
- * 5.1.2 All modifications by welding to pressure retaining portions of TVA components or piping systems.
- * 5.1.3 Replacement, by welding, of all pressure retaining portions of TVA components or piping systems.

- 5.2 The permanent plant organizations that do not possess ASME Section III accreditation may perform the following kinds of activities:

- 5.2.1 Open and close bolted or threaded connections. Activities include but are not limited to: removing and replacing threaded pipe caps or plugs; opening and closing a flanged joint or removing a flanged valve to perform inspections; and removal of reactor vessel head or instrument columns to perform inspections or maintenance. Opening and closing a mechanical joint of an ASME Section III Class 1 component or system requires a leak test at nominal operating pressure in accordance with PMP-1502.08.
- 5.2.2 Removal and reinstallation of pipe clamps and pipe supports. These activities include but are not limited to: removing and reinstalling pipe clamps and supports that are mechanically attached to ASME code class piping systems; reworking, modifying, or fabricating component supports; and installing pipe supports by mechanical means. ASME support-to-pipe welds must be performed by an organization possessing ASME Section III accreditation.
- 5.2.3 Removal and reinstallation of component access openings and manway cover plates (steam generators, pressurizers, etc.).
- * 5.2.4 Replacement of nonpressure retaining components (i.e., coter pins or supports, valve packing, mechanical seals).

- * 5.2.5 Pressure boundary repairs, replacements, or modifications
* that do not require welding. Repairs, replacements, or
* modifications to ASME Section XI components shall be in
* accordance with the Watts Bar ASME Section XI Repair/
* Replacement Program.
- 5.2.6 Motor Operated Valve Analysis and Test System (MOVATS)
testing of Limitorque valve operators.
- * 5.2.7 Routine maintenance activities which include but are not
* limited to lapping or replacement of nonintegral valve
* seats, adjustment or replacement of valve packing, pump
* seal maintenance, etc.
- 5.2.8 Surface conditioning of welds by mechanical means for
preservice or inservice inspection.
- 5.2.9 Cutting into a code system (i.e., the piping or weld).
ANII involvement shall be required for all cutting
activities. These activities do not include any welding.
- 5.2.10 All pipe/tubing bending processes.
- * 5.3 Work described in 5.1 above shall be performed in accordance with
* the TVA Nuclear Components Manual. Work described in 5.2 above
* shall be performed in accordance with the Nuclear Power Nuclear
* Quality Assurance Manual.

ENCLOSURE 2

LIST OF COMMITMENTS

Site Director Procedure Administrative Instruction (AI)-9.15, attachment 1, revision 9, is being revised to allow the maintenance organization greater flexibility.