

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

6N 38A Lookout Place

APR 20 1989

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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) - RADIOGRAPHIC FILM REEVALUATION OF THE
REFUELING WATER STORAGE TANKS

In accordance with the commitment made by TVA in our December 5, 1986, letter and a recommendation by Nuclear Regulatory Commission (NRC) in inspection report 50-390/86-17, TVA has been performing a WBN vendor weld evaluation. It was recommended specifically by NRC in their report that radiographs supplied by Pittsburgh-Des Moines Steel Corp (PDM) and four other companies be reviewed further by TVA.

This review has identified PDM radiographs which do not meet code requirements, either because of inadequate radiographic technique or indications in the weld zone. The radiographs are from the refueling water storage tanks (two) fabricated by PDM in 1978 at WBN. It has been determined that several welds will require repair. To complete these repairs, TVA and PDM are working to reach an agreeable solution. PDM no longer possesses a valid American Society of Mechanical Engineers (ASME) Section III Certificate of Authorization. Therefore, TVA is considering having PDM make the necessary repairs under TVA's ASME Section XI program using the ASME Section III technical requirements from the original construction code.

This plan would allow PDM as a noncertificate holder to perform work on an ASME Section III stamped component using TVA's Section XI program. TVA's Section XI quality assurance (QA) program has controls which are equivalent to the ASME Section III QA program controls. This ensures that the technical requirements of the original construction code, e.g., fabrication and installation, examination, testing, authorized nuclear inspector (ANI) inspection, and authorized nuclear in-service inspector (ANII) inspection, will be met. The initial acceptance of repair or rework activities will be PDM's responsibility with final radiographic acceptance to be completed by TVA.

To comply with NRC's position stated in the December 24, 1987, letter (ASME Section III Requirements for Welding Activities), TVA must request approval from the NRC staff for proposed alternatives to the code of record. The tanks in question have been documented as complete through generation of N-5 data reports. To utilize PDM's expertise for completion of the necessary repairs, TVA requests approval to use PDM to make the necessary repairs using TVA's ASME Section XI program.

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Documentation will be as committed in TVA's December 24, 1987, letter. Repair activities will be documented by supplementing the N-5 data reports for each tank.

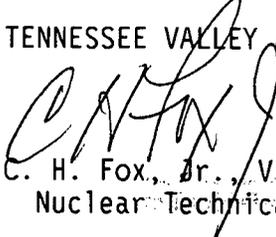
Two additional tanks, primary make-up water storage tanks, were also fabricated by PDM at WBN to meet the requirements of ASME Section III. TVA's review of these radiographs has identified discrepancies similar to those found in the refueling water storage tank radiographs. TVA has not completed their evaluation to determine the necessary corrective action for these two tanks, including safety classification and appropriate criteria for resolution.

TVA believes that this approach to completing the repairs on the refueling water storage tanks is appropriate and acceptable, and requests NRC approval. If there are any questions, please telephone D. E. McCloud at (615) 365-8527.

The enclosure lists the new commitments found in this report.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


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

Enclosure

cc (Enclosure):

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ENCLOSURE

LIST OF COMMITMENTS

1. Pending the Nuclear Regulatory Commission's (NRC) approval, TVA will have Pittsburgh-Des Moines Steel Corp (PDM) made the necessary repairs under TVA's ASME Section XI program using the ASME Section III technical requirements from the original construction code (ASME Section III, 1974 with winter 1975 agenda).
2. The initial acceptance or repair or rework activities for the refueling water storage tanks will be PDM's responsibility with final radiographic acceptance to be completed by TVA.