## TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

6N 38A Lookout Place

## DEC 07 1989

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

Gentlemen:

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

WATTS BAR NUCLEAR PLANT (WBN) - CORRECTIVE ACTION PROGRAM (CAP) PLAN FOR WELDING

This letter is being sent to you to correct an error on Page 19 of the Welding CAP Plan which was last submitted to NRC on May 12, 1989. It was incorrectly stated on this page that all ASME Section III Class 1 lugs had been determined to be acceptable by ultrasonic examination. The following statement correctly identifies how the Class 1 lugs were determined to be acceptable (correction underlined).

At present, all ASME, Section III, Class 1 lugs have been determined to be acceptable by ultrasonic examinations <u>or</u> <u>inspection for backgouging</u>.

Enclosed for your information is the corrected page.

Please refer any specific questions to G. R. Ashley at (615) 365-8527.

Very truly yours,

**TENNESSEE VALLEY AUTHORITY** 

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Mark O. Medford, Vice President Nuclear Technology and Licensing

Enclosure cc: See page 2

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## U.S. Nuclear Regulatory Commission

## DEC 07 1989

cc: (Enclosure)
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Attachment 4 Page 3 of 7 (Corrected Copy)

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3. Piping Shear Lugs

During rework activities on unit 1 pipe supports, it was discovered that welds joining the piping shear lugs to the pipe were not complete penetration as required by the design drawings. In addition, the welds on some of the shear lugs did not extend the entire length of the lug. This nonconformance was also identified by DOE/WEP during their evaluation and was reported under SCR W-518-P for unit 1 which was reported under 10 CFR 50.55(e) (reference 8).

All shear lugs on safety-related systems will be addressed. At present, all ASME Section III, Class 1, lugs have been determined to be acceptable by ultrasonic examination or inspection for backgouging. Lugs on ASME Section III, Class 2 and Class 3 code piping, where full penetration welds were specified on the design drawings, will be reanalyzed using ASME Code Case N-318 to determine the required size for fillet welds or partial penetration welds. For lugs found not to have a reinforcing fillet weld, the required minimum penetration will be established. For welds not meeting minimum requirements, fillet welds, meeting the requirements of Code Case N-318, will be added. Additionally, although the ASME Code Case is not applicable to B31.1 code piping, its logic will be used in the same manner on Category I and Category I(L) pressure boundary lugs attached with full penetration welds to this class piping located in Category I structures. The welds will require reinspection to determine if the existing fillet welds are of sufficient size to meet design requirements. The completion of this evaluation is dependent on the completion of TVA's Hanger and Analysis Up-Date Program (HAAUP). The WBN FSAR will be revised to allow the use of ASME Code Case N-318 as endorsed by NRC Regulatory Guide 1.84.

Reanalysis began in February 1988, is presently ongoing, and is scheduled to complete before fuel load of unit 1. The schedule for reinspection and rework, if required, will be developed based on the results of the reanalysis which is being accomplished as part of TVA's HAAUP.

An evaluation was performed to determine safety significance by selectively inspecting 120 existing lugs and performing evaluations based on design loads. Although the lugs were originally designed for a full penetration weld, the evaluation was, in general, based on the measured external fillet weld reinforcement which is consistent with ASME Code Case N-318. Of the 120 lugs, 115 were suitable for service with only the fillet welds. For the remaining five lugs, the required minimum weld penetration was determined and was confirmed to meet design requirements for the existing installation.

4. Wall-Mounted Instrument Panels

The seismic adequacy of approximately 122 unit 1, site-fabricated local instrument panels in several safety-related systems at WBN was questioned because of discrepancies identified in the fabricated configuration.