## TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

**net 24 1990** 

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

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

The Nuclear Regulatory Commission (NRC) position provided in a July 2, 1987 letter to TVA stated that welding activities at WBN should be performed to the Construction Code of Record, ASME Section III - 1971 Edition through Summer 1973 Addenda. To comply with the NRC position, 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.

Following WBN completion of design evaluations, modifications, repairs and successful prestart testing, systems are being turned over to the Operations department. TVA is proposing that when the requirements of the construction code for welding activities have been satisfied, including supplements to the N-5 data packages and system acceptance by operations, any future welding activities affecting the system be completed to the requirements of ASME Section XI.

This process would allow TVA to transition from Section III welding activity requirements that apply during the construction phase of the plant to Section XI for the operating phase of the plant. TVA requests NRC approval of this approach for transitioning to ASME Section XI requirements.

If there are any questions, please telephone P. L. Pace at (615) 365-1824.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

9010310005

E. G. Wallace, Manager Nuclear Licensing and Regulatory Affairs

cc: See page 2

50-391

cc: Ms. S. C. Black, Deputy Director Project Directorate II-4 U.S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

> NRC Resident Inspector Watts Bar Nuclear Plant P.O. Box 700 Spring City, Tennessee 37381

Mr. P. S. Tam, Senior Project Manager U. S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

Mr. B. A. Wilson, Project Chief U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323