



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381

FEB 07 1996

10 CFR 50.55a(a)(3)

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

Gentlemen:

In the Matter of
Tennessee Valley Authority

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)
Docket No. 50-390

WATTS BAR NUCLEAR PLANT (WBN) - 10 CFR 50.55a(a)(3) REQUEST FOR RELIEF FROM CERTAIN AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI REQUIREMENTS FOR SNUBBERS

The purpose of this letter is to request relief from certain ASME Section XI inservice inspection and testing requirements for snubbers.

The enclosed relief request would exempt Code Class 1, 2, and 3 snubbers from the requirements of the 1989 Edition of the ASME Section XI Code. Snubbers at Watts Bar Unit 1 would be inspected and tested in accordance with the requirements in Section 3.7.3 of the Watts Bar Unit 1 Technical Requirements Manual (TRM). The TRM was submitted to the NRC by TVA letter dated October 18, 1995.

If you should have any questions, please contact J. Vorees at (423) 365-8819.

Sincerely,

D. V. Kehoe
Nuclear Assurance
and Licensing Manager

Enclosure
cc: See page 2

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U.S. Nuclear Regulatory Commission
Page 2

FEB 07 1996

cc (Enclosure):

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ENCLOSURE

REQUEST FOR RELIEF

Components:

American Society of Mechanical Engineers (ASME) Section XI Code Class 1, 2, and 3 snubbers.

Code Requirements:

ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition, Subarticles IWF-5200 and IWF-5300 require that examinations and testing be performed in accordance with the 1988 Addenda to ASME/ANSI OM-1987, Part 4. These requirements provide the methodology and corrective actions for examination and functional testing of snubbers. In addition, IWA-6230 requires inservice inspection summary reports for snubbers be filed with the regulatory authority, and IWA-2100 requires authorized nuclear inservice inspector involvement for snubber examination and testing.

Code Requirement From Which Relief Is Requested:

1989 Edition of ASME Section XI Code.

Basis For Relief:

WBN is required to incorporate the 1989 Edition of ASME Section XI Code as the governing document for the first ten-year inservice inspection interval. Requirements for the examination and functional testing of all safety-related snubbers to ensure their operability are already contained in the Watts Bar Unit 1 Technical Requirements Manual (TRM).

The OM-1987, Part 4, scope would require all ASME Class 1, 2, or 3, snubbers to be inspected and tested. These components are within the TRM scope, but OM-1987, Part 4, would require the creation of a separate program. OM-1987, Part 4, would also require special certification of inspection and test personnel and use of snubber test apparatus that would require the removal of snubbers to a test area. Operability testing of snubbers could not be performed in place at the snubber's location. In addition, OM-1987, Part 4, does not allow for the reduction of the frequency of inspections and tests based on performance results that is allowed in the current TRM program and the guidelines included in Nuclear Regulatory Commission Generic Letter (GL) 90-09.

The implementation of OM-1987, Part 4, will require Watts Bar to initiate a snubber examination and testing program that is more complicated and expensive to perform, without a compensating increase

in the level of quality and safety. The added burden of such a program is not supported by the results obtained from the current TS and preventive maintenance programs on snubbers at other TVA sites.

Alternate Examinations:

Watts Bar Nuclear Plant will perform examination and testing of snubbers as required by Technical Requirement (TR) 3.7.3, "Snubbers."

Justification For the Granting Of Relief:

The current program, as defined by TR 3.7.3, provides for a level of quality and safety equal to or greater than that of OM-1987, Part 4. OM-1987, Part 4, provides for failure mode grouping of snubbers that fail visual examination; only those snubbers identified as being in that group would require shortened examination intervals. Under the existing TR program, all snubbers in the population would be placed in a shortened inspection interval. Therefore, the existing TRM program is more conservative in corrective action than the OM-1987, Part 4, requirements. The alternative examination criteria is based on GL 90-09. The differences in the two programs could create confusion when selecting test samples, applying acceptance criteria, corrective actions, and examination schedules for failed snubbers. This situation could increase the possibility of applying the wrong action, thus creating a nonconformance, an inoperability, or a violation of a TRM requirement.

To eliminate any misinterpretation or confusion in administering similar requirements for snubbers, and to remove the possibility of applying contradicting requirements to the same snubber(s), TVA proposes to examine and test snubbers in accordance with WBN TR 3.7.3. TRM requirements for testing and examination of snubbers provide an equal or greater level of quality and safety than ASME Section XI Code.

Conclusion:

Based on the above justification, TVA concludes that inservice examination and testing of snubbers in accordance with the 1988 Addenda to ASME/ANSI OM-1987, Part 4, would result in hardship or unusual difficulty without a corresponding increase in the level of quality and safety. WBN's examination and testing of snubbers in accordance with TR 3.7.3 will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3), TVA requests that relief be granted.

Implementation Schedule:

This Request for Relief is applicable to WBN's first inspection interval which will commence at commercial operation.