



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

August 17, 2009

10 CFR 50.55a(g)(5)(iii)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Sequoyah Nuclear Plant, Units 1 and 2
Facility Operating License Nos. DPR-77 and DPR-78
NRC Docket Nos. 50-327 and 50-328

Subject: **American Society of Mechanical Engineers Section XI Inservice
Inspection Program - Withdrawal of Relief Requests**

- References:
1. TVA Letter to NRC dated February 19, 2009, "American Society of Mechanical Engineers (ASME) Section XI Inservice Inspection (ISI) Program - Relief Requests"
 2. NRC Letter to TVA dated July 23, 2009, "Sequoyah Nuclear Plant - NRC Integrated Inspection Report 05000327/2009003 and 05000328/2009003"

On February 19, 2009, the Tennessee Valley Authority (TVA) submitted 11 relief requests from American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code requirements pursuant to 10 CFR 50.55a(g)(5)(iii). The relief requests were associated with Inservice Inspection (ISI) activities performed during Sequoyah Nuclear Plant's ASME Section XI Second 10-Year ISI Interval. The relief requests were based on limitations that precluded full code examination coverage for ASME code welds and components. Full code examination of the welds and components was limited because of design configurations.

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The limited examinations referred to in the 11 relief requests were performed in the Second 10-Year ISI Interval which ended May 31, 2006. When a Code examination requirement is determined to be impractical, 10 CFR 50.55a(g)(5)(iv) requires a relief request be submitted not later than 12 months after the expiration of the 10-Year ISI Interval during which the examination is determined to be impractical. As noted in Reference 1, TVA originally prepared the relief request submittal on January 27, 2007; however, the request was inadvertently withheld from being submitted to the NRC until February 19, 2009. This issue was identified by Sequoyah Nuclear Plant and documented in the Corrective Action Program.

Because the Second 10-Year ISI Interval has ended, TVA is withdrawing the 11 relief requests submitted for review in the February 19, 2009 letter. TVA notes that the NRC reviewed TVA's evaluation of the cause and corrective actions for the late submittal of relief requests as documented in NRC Integrated Inspection Report 05000327/2009003 and 05000328/2009003 (Reference 2). At the close of this inspection, the NRC inspectors stated that not submitting the relief requests to the NRC within the required time is considered a minor violation. It is our understanding, based on discussions with Region II management, that the inspectors reviewed the limited examinations and found them acceptable. Accordingly, TVA considers that the Sequoyah Nuclear Plant is in compliance with the applicable requirements of 10 CFR 50.55(a)(g) and the plant's ASME Section XI ISI Program for the Second 10-Year ISI Interval. If the welds and components are examined during the current Sequoyah Nuclear Plant Third 10-Year ISI Interval and full code examination coverage cannot be obtained, TVA will submit the relief requests for the applicable welds and components in accordance with 10 CFR 50.55a(g)(5)(iii).

There are no new regulatory commitments in this letter. If you have any questions concerning this letter, please contact Kevin Casey at (423) 751-8523.

Respectfully,



R. M. Krich
Vice President
Nuclear Licensing

cc: NRC Project Manager - Sequoyah Nuclear Plant