

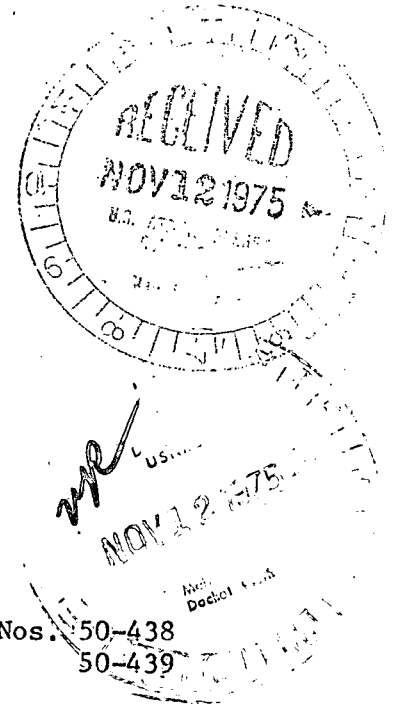


831 Power Building  
TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

Regulatory Docket File

November 10, 1975



Director of Nuclear Reactor Regulation  
Attention: A. Schwencer, Chief  
Branch 2-3  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Schwencer:

In the Matter of the Application of ) Docket Nos. 50-438  
Tennessee Valley Authority ) 50-439

Karl Kniel's letter to J. E. Watson dated April 9, 1975, on the Sequoyah Nuclear Plant, Docket Nos. 50-327 and 50-328, included an NRC position entitled "Augmented Inservice Inspection of High-Energy Fluid System Piping." TVA is following the guidance provided in paragraphs 1 and 2 of this position; however, we would like to propose an alternate approach to paragraph 3 which addresses inservice inspection of welds enclosed in containment penetration guard pipes.

TVA feels that the requirements for inservice inspection of these welds can be relieved by providing added insurance against failure by the reduction of the primary stresses in the welds under consideration thereby reducing the possibility of weld failure. We therefore propose that:

1. Stresses in these welds be reduced by increasing the nominal wall thickness in these areas by at least 10 percent over that specified. This thickness shall be maintained over the entire length of the penetration between attachment welds inside and outside of containment.
2. We will further increase weld integrity by adding ultrasonic test requirements to the flued head to process pipe weld during fabrication. In other words we are decreasing the probability of failure by increasing reliability of the weld through increased testing.

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3. Inservice inspection requirements for these welds shall be reduced to visual examination of surrounding areas for signs of leakage or distress. We propose to initiate an ASME Section XI code case covering this.

The Bellefonte Nuclear Plant design is progressing on the basis of this alternate proposal. Therefore, we request that NRC review this proposal expeditiously and inform us of the results of your review as soon as possible.

Very truly yours,



J. E. Gilleland  
Assistant Manager of Power