

## **NRR-PMDAPem Resource**

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**From:** Wang, Alan  
**Sent:** Monday, March 07, 2016 1:27 PM  
**To:** GArent@TVA.gov  
**Cc:** Casey, Kevin E; Schaaf, Robert; dlboyd@tva.gov; cedmondson@tva.gov  
**Subject:** Acceptance of Watts Bar Nuclear Plant, Unit 2 Request for Relief IST-RR-5 (MF7396)

Gordon,

by letter dated February 23, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16054A586), Tennessee Valley Authority (TVA, the licensee) submitted relief request IST-RR-5 for the Watts Bar Nuclear Plant, Unit 2 (WBN2). Pursuant to 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), TVA is requesting an alternative to the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, Mandatory Appendix I, Section I-7210 requirement for testing the pressurizer safety valves (PSVs) within six months of initial criticality. Specifically, TVA is requesting the six months prior to initial criticality requirement be extended to nine months prior to initial criticality. This alternative request would extend the time period for compliance with ASME OM Code, Mandatory Appendix I, Section I-7210 from April 13, 2016 to July 13, 2016. The purpose of this letter is to provide the results of the US Nuclear Regulatory Commission (NRC) staff's acceptance review of this request for relief.

10 CFR 50.55a(f), "Inservice Testing Requirements," requires, in part, that IST of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with the specified ASME OM Code and applicable addenda incorporated by reference in the regulations. Exceptions are allowed where alternatives have been authorized by the NRC pursuant to paragraphs (z)(1), or (z)(2) of 10 CFR 50.55a. In proposing alternatives, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety (10 CFR 50.55a(z)(1)), or (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety (10 CFR 50.55a(z)(2)). Section 50.55a allows the NRC to authorize alternatives from ASME OM Code requirements upon making the necessary findings.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to proceed with its detailed technical review and make an independent assessment regarding the acceptability of the proposed request for relief in terms of regulatory requirements and the protection of public health and safety and the environment. If additional information is needed for the staff to complete its technical review, you will be advised by separate correspondence.

If you have any questions, please contact me at (301) 415-1445.

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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 2710

**Mail Envelope Properties** (Alan.Wang@nrc.gov20160307132700)

**Subject:** Acceptance of Watts Bar Nuclear Plant, Unit 2 Request for Relief IST-RR-5 (MF7396)  
**Sent Date:** 3/7/2016 1:27:28 PM  
**Received Date:** 3/7/2016 1:27:00 PM  
**From:** Wang, Alan  
**Created By:** Alan.Wang@nrc.gov

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MESSAGE	2753	3/7/2016 1:27:00 PM

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**Sensitivity:** Normal  
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