

POOR ORIGINAL

TENNESSEE VALLEY AUTHORITY
400 Chestnut Street Tower II

October 18, 1979

Director of Nuclear Reactor Regulation
Attention: Mr. L. S. Rubenstein, Acting Chief
Light Water Reactors Branch No. 4
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Rubenstein:

In the Matter of the Application of)
Tennessee Valley Authority) Docket No. 50-327

During hot functional testing at Sequoyah Nuclear Plant unit 1 a hanger failed to slide and caused the six-inch pressurizer relief piping to undergo plastic deformation. This condition was reported to NRC Office of Inspection and Enforcement in Nonconformance Report SWP-79-S-8. This deformed pipe was returned to its required shape by selective deposition of welding material. Subsequent to the welding, the weld area was examined by radiographic and liquid penetrant inspections in accordance with the requirements of ASME Section III. An ultrasonic test will be performed as required by ASME Section XI before fuel loading of unit 1.

TVA requests permission to use the exemptions from hydrostatic testing outlined in IWA 4400 of the Summer 1978 Addenda to ASME Section XI, Pressure Test Exemptions. According to the October 9, 1979, edition of the Federal Register, the NRC has amended 10 CFR 50.55a to allow use of this addenda subject to the approval of the Commission.

TVA believes that exemptions from hydrostatic testing is justified and does not compromise the safety of the plant, for the following reasons:

1. The process of welding to realign the pipe did not penetrate the pressure boundary (i.e., did not penetrate through the pipe wall). This was verified by radiographic examination.
2. The weld area was subject to all of the examination requirements of ASME Sections III and XI.

If you have any questions regarding this matter, please call David Lambert at FTS 854-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills

L. M. Mills, Manager
Nuclear Regulation and Safety

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