TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

DOCKET NO. 50-
PROPOSED RULE PR - Misc. Notice
Reg. Guide

November 19, 1979

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir:

In accordance with provisions for public review and comment indicated in the Federal Register on January 17, 1979, the Tennessee Valley Authority (TVA) is pleased to provide the enclosed comments on the following draft regulatory guide:

Task SC 721-4 - "Inservice Inspection Code Case Acceptability ASME Section XI, Division 1"

Since the content and interpretation of regulatory guides have a large impact on TVA's extensive nuclear commitment, we welcome the opportunity for review and comment. TVA comments on additional regulatory guides will be forthcoming as a part of a continuing program.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure
cc (Enclosure):
Executive Secretary
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
1717 H Street, NW
Washington, DC 20555

Mr. Fred Stetson
AIF, Inc.
7101 Wisconsin Avenue
Washington, DC 20555

Acknowledgment card 11/30/79

8001080252

ENCLOSURE

Tennessee Valley Authority's Comments on
Task SC 721-4 - "Inservice Inspection Code
Case Acceptability ASME Section XI, Division 1"

1. Page 4, Section C - We recommend that the conditional acceptance of Code Case N-210 be deleted. This code case exempts repairs to piping, pumps, and valves from hydrostatic testing provided that the repair cavity does not penetrate the wall thickness. We could not determine any technical justification to support the imposition of the limit where the depth of the repaired cavity does not exceed 25 percent of the wall thickness.

2. Page 5, Section D.1 - We recommend that the phrase "Except for those code cases that have been annulled by action of the ASME Council. . ." be deleted from Section D.1. The NRC currently accepts only the summer 1975 addenda for inservice inspection. Therefore, we have need to use code cases which have been annulled by recent Council actions.

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