



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 19, 1990

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Branch*
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Locket No. 50-328

Mr. Oliver D. Kingsley, Jr.
Senior Vice President, Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: FIRST 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM (TAC 59458) -
SEQUOYAH NUCLEAR PLANT, UNIT 2

In the letter dated November 9, 1988, the Tennessee Valley Authority (TVA) submitted Revision 13 of the first 10-Year Interval Inservice Inspection (ISI) Program for Sequoyah, Unit 2. The program was submitted for review and evaluation of its compliance with the 1977 Edition with addenda through Summer 1989 of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Code) and the NRC-imposed augmented and accelerated field weld inspections. TVA responded to questions from the NRC staff on this program in its letter dated May 5, 1989. The NRC-imposed augmented and accelerated field weld inspection program is discussed in Section 3.5 of NUREG-1232, Volume 2 and its Supplement, which were issued in the staff's letters dated May 18, 1988 and February 3, 1989, respectively.

The staff, with technical assistance from the Science Applications International Corporation (SAIC), has reviewed and evaluated the ISI Program for Unit 2 and the requests for relief from the requirements of the Code for Unit 2. Based on the information submitted, the staff agrees with and adopts the contractor's conclusions and recommendations presented in the attachment to the enclosed Safety Evaluation Report (SER). A list of all the applicable TVA submittals is given in the contractor's report.

For the Unit 2 ISI Program, TVA submitted 14 requests for relief from the requirements of the Code: ISI-1 to ISI-14. As discussed in the enclosed SER, we have determined that these requests are acceptable except for the following four requests: ISI-2, ISI-7, ISI-11, and ISI-12. Of these four requests, one was withdrawn (ISI-11), one is not needed (ISI-12), and two are postponed (ISI-2 and ISI-7).

Granting relief from Code requirements is authorized by law where (1) the proposed alternative would provide an acceptable level of quality and safety (pursuant to 10 CFR 50.55a(a)(3)(i)) and (2) the Code requirement is impractical and the alternative requirement will not endanger life or property, or the common defense and security, and is in the public interest (pursuant to 10 CFR 50.55a(g)(6)(i)). For two requests, ISI-9 and ISI-14, we have determined that the proposed alternatives to the Code requirements will provide an acceptable level of quality and safety at Unit 2. For the remaining eight requests,

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ISI-1, ISI-3 to ISI-6, ISI-8, ISI-10, and ISI-13, we have determined that the Code requirements are impractical to perform at Unit 2 and the alternative requirements will not endanger life or property, or the common defense and security, and are in the public interest considering the burden that could result on TVA if the Code requirements were imposed on Unit 2.

Therefore, pursuant to 10 CFR 50.55a(a)(3)(i) and 10 CFR 50.55a(g)(6)(i) of the Commission's regulations, TVA is granted the following requested relief from the Code, as documented in the enclosed SER: requests for relief ISI-1, ISI-3 to ISI-6, ISI-8 to ISI-10, ISI-13, and ISI-14. Where the relief request status is "Granted with augmented requirements," the augmented requirements are as recommended in the SER. The granting of these relief requests is contingent upon all other requirements of Section XI being met for inservice tests and system pressure tests of the components affected by these relief requests.

Any significant program changes such as additional requests for relief should be submitted for staff review and should not be implemented prior to approval by the staff.

A summary of the requirements and the bases for granting the relief requests are contained in the enclosed SER. We concluded that the Sequoyah Nuclear Plant, Unit 2, Inservice Inspection Program, Revision 13, with the additional information in the May 5, 1989 letter and the reliefs granted constitute part of the basis for TVA meeting the requirements of 10 CFR 50.55a and the Unit 2 Technical Specifications at Sequoyah, Unit 2. With the reliefs granted, we also conclude that Unit 2 is in compliance with the Code of record for Unit 2, cited above in the first paragraph.

Sincerely,

Original signed by

Suzanne Black, Assistant Director
for Projects
TVA Projects Division
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation Report
With SAIC Technical
Evaluation Report

cc w/enclosure:

See next page

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Mr. Oliver D. Kingsley, Jr.

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