

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

October 3, 1980

50-327

Mr. Harold W. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20545

Dear Mr. Denton:

In the Matter of
Tennessee Valley Authority

Docket No. 50-327

During the initial hearing after receipt of the full power license for
Snoqualmie Nuclear Plant, a difference of interpretation arose regarding
Surveillance Requirement (SR) 4.4.4.2.4 in the technical specifications.
This letter documents an understanding between TVA and NRC reached during
telephone conference calls on September 24 and September 25, 1980, regard-
ing the definition of "improved" ultrasonic (U) inspection techniques.
TVA requests that NRC provide written concurrence with this understanding.
TVA also requests that NRC provide clarification on the inspection
intervals. Both items are discussed below.

SR 4.4.4.2.4 states in part that "... areas of the pressurizer relief
line shall be examined using improved UT detection and evaluation
procedures. . . ." Supplement No. 2 of the Sequoyia Safety Evaluation
Report states in part "... that an augmented inspection program should be
implemented for the relief well. . . as defined in NUREG-0013, Revision 1
... ." Section III.A.7 of NUREG-0013 states that "Improved UT pro-
cedures have been developed by certain organizations." Specific inspection
technique details are not provided.

TVA called the NRC staff and region offices to try to determine the exact
requirements necessary to satisfy SR 4.4.4.2.4. E. S. Whelan (NRC-DM) stated that Lambert, MacCall, and Thomas (NRC) had successfully used an
"improved" UT method at another reactor plant. TVA called NRC to get the
specific details of their inspection technique. NRC uses two 1.5 MHz
transducers arranged in a pitch-catch configuration. Instruments gain is
set as high as feasible and all indications are evaluated. TVA's inspec-
tion technique is identical to the LHM method except 2.25 MHz transducers
are used. Mr. Lambert and E. S. Whelan (NRC-DM-PLI) agreed that TVA's
"improved" UT method was acceptable for the required inspections.

TVA requests that the NRC provide written concurrence of the acceptability
of TVA's "improved" UT method in order to facilitate reactor opera-
tions during future inspections.

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Mr. Harold R. Denton, Director

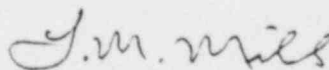
October 9, 1980

Paragraph 1 of SR 4.4.3.2.4 requires that inspections be made before entering MODE 4 whenever the unit has been in cold shutdown for 72 hours or more and the inspection has not been done in the previous six months. Paragraph 2 has a discussion of the "six-month" inspections. TVA's interpretation of the first paragraph is that a shutdown is not required after six months but that the inspections are done when the plant has been in cold shutdown for other reasons for 72 hours, but not more often than once per six months. As such, the "six-month" inspections may have an interval between inspections greater than six months. After three successful inspections, the inspection interval would be increased to 36 months, but the same interpretation logic would hold true.

TVA requests that the NRC provide written concurrence of TVA's interpretation that a plant shutdown is not required at the end of the inspection interval in SR 4.4.3.2.4 but that the inspection is to be conducted during a shutdown caused by some other reason.

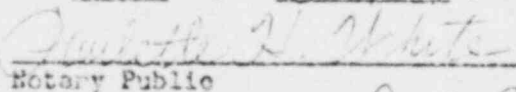
Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Sworn to and subscribed before me
this 9th day of Oct. 1980



Notary Public

My Commission Expires 9-5-84

cc: Mr. James P. O'Reilly, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region II - Suite 3100
101 Marietta Street
Atlanta, Georgia 30303