



## NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

February 7, 1991

Docket No. 50-328

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

Dear Mr. Kingsley:

SUBJECT: FIRST 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM, REVISION 14

(YAC 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 the Sequoyah Nuclear Plant, Unit 2. The program was submitted for review and evaluation of its compliance with the 1977 Edition with Addenda through Summer 1978 of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Code) and the NRC-imposed augumented and accelerated field weld inspections.

For the Unit 2 ISI Program, TVA submitted 14 requests for relief from the requirements of the Code: ISI-1 to ISI-14. The staff has reviewed and evaluated the ISI program for Unit 2 and the 14 requests for relief from the requirements of the Code for Unit 2. The staff forwarded its safety evaluation of the ISI program in its letter dated April 19, 1990. In that evaluation, we determined that 10 requests for relief were acceptable: ISI-1, ISI-3 to ISI-6, ISI-8 to ISI-10, ISI-13, and ISI-14. In that evaluation, we incorrectly referred to the 1977 Edition with Addenda through Summer 1989 of Section XI of the Code for Unit 2 when we should have referred to the 1977 Edition with Addenda through Summer 1978 as given above. As discussed in the Safety Evaluation issued April 19, 1990, we 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 Of these four requests, one was withdrawn (ISI-11), one is not needed (ISI-12), and two were postponed (ISI-2 and ISI-7). In the staff's letter dated April 19, 1990, TVA was granted the following requests: ISI-1, ISI-3 to ISI-6, ISI-8 to ISI-10, ISI-13, and ISI-14. Where the relief request status was "Granted with augumented requirements," the augumented requirements are as stated in the Safety Evaluation issued with the letter.

TVA submitted Revision 14 to this program by letter dated June 12, 1989. This revision was characterized by TVA as including minor programmatic changes, editorial changes, corrections to typographical errors, and no new relief requests or commitments. In the letter dated July 12, 1990, TVA provided additional information concerning five requests for relief for Unit 2. One was Relief Request ISI-3 which had been modified by Revision 14 to include 18 additional weld joints for which the licensee required relief. The others were Relief Requests ISI-1, ISI-2, ISI-6, and ISI-8.

In reviewing this new material, the staff concluded that this additional information necessitates modifications of the Safety Evaluation on the ISI program for Unit 2 which was issued in the letter dated April 19, 1990. The staff accepts adding 18 additional welds to Relief Request ISI-3 and the proposed modifications to the augmented requirements for granting relief for Relief Requests ISI-1, ISI-6, and ISI-8, based upon the additional information provided. Relief Request ISI-2 remains postponed. This is discussed in the enclosed safety evaluation.

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 the five requests where additional information was provided, one remains postponed (i.e., ISI-2) and four as modified by the additional information are acceptable (i.e., ISI-1, ISI-3, ISI-6, and ISI-8). We have determined that for these four modified relief requests 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(g)(6)(i) of the Commission's regulations, TVA is granted the following requested relief from the Code, as documented in the enclosed safety evaluation: ISI-1 with the revised augmented requirements; ISI-3 for the additional 18 valves listed in TVA's letter dated June 12, 1989; ISI-6 with the revised augmented requirements; and ISI-8 with the revised augmented requirements. Where the relief request status is granted with revised augmented requirements, the revised augmented requirements are as stated in the enclosed safety evaluation. The granting of these relief requests is contingent upon all other requirements of Section XI of the Code 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 safety evaluation and in the safety evaluation issued April 19, 1990. We conclude that the Sequoyah Nuclear Plant, Unit 2, Inservice

Inspection Program, Revision 14, with the additional information in the July 12, 1990 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. 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,

Frederick J. Hebdon, Director

Firanne Black/

Project Directorate II-4

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Safety Evaluation

cc w/enclosure: See next page meeting the requirements of 10 CFR 50.55a and the Unit 1 Technical Specifications at Sequoyah Nuclear Plant, Unit 1. With the reliefs granted, we also conclude that Unit 1 is in compliance with the Code of record for Unit 1, cited above in the first paragraph.

Sincerely, Original signed by Suzanne Black for

Frederick J. Hebdon, Director Project Directorate II-4 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Safety Evaluation

cc w/enclosure: See next page

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