Docket



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

February 7, 1991

Docket No. 50-327

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 59457) - SEQUOYAH NUCLEAR PLANT, UNIT 1

In its letter dated May 5, 1989, the Tennessee Valley Authority (TVA) submitted Revision 14 of the first 10-year interval Inservice Inspection (ISI) Program for Sequoyah, Unit 1. The program was submitted for the NRC staff's 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 augmented and accelerated field weld inspections. TVA also responded to questions from the NRC staff in its dated July 12, 1990. 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 1 and the requests for relief from the requirements of the Code for Unit 1. Based on the information submitted, the staff agrees with and adopts the contractor's recommendations except as discussed in the enclosed Safety Evaluation (SE). The contractor's conclusions and recommendations are presented in the contractor's Technical Evaluation Report attached to the enclosed SE. A list of all applicable TVA submittals is given in the contractor's report.

The ISI program and associated relief requests for Unit 2 are to the same Edition/Addenda of the Code and have many similarities with those for Unit 1. In a letter dated July 12, 1990, TVA provided additional information concerning the requests for relief for both Units 1 and 2. This additional information necessitated the revision of the recommendations of the SAIC report for Sequoyah Nuclear Plant, Unit 1, which are addressed in the attached SE. The SE concerning the first 10-year interval ISI Program for Unit 2, which was issued in the letter dated April 19, 1990, will be supplemented in a separate letter.

For the Unit 1 ISI Program, TVA submitted 13 requests for relief from the requirements of the Code: ISI-1 to ISI-13. As discussed in the enclosed SE, we have determined that nine of these requests may be granted. Of these nine requests, we have determined that the Code requirements for eight requests, ISI-1, ISI-3 to ISI-6, ISI-8, ISI-10, and ISI-13, are impractical to perform at Unit 1 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 1. For the remaining relief request, ISI-9, we have determined that the proposed alternatives to the Code requirements will provide an acceptable level of quality and safety at Unit 1.

For the four relief requests we could not grant, one was withdrawn one is not needed (ISI-12), and two are postponed (ISI-2 and ISI-

Granting relief from Code requirements is authorized by law where proposed alternative would provide an acceptable level of quality at safety (pursuant to 10 CFR 50.55a(a)(3)(i)), (2) compliance with the specified requirements would result in hardship or unusual difficulties without a compensating increase in the level of quality and safety (pursuant to 10 CFR 50.55a(a)(3)(ii)), or (3) the Code requirement is impractical and the tive requirement will not endanger lift or property, or the common defendance security, and is in the public interest (pursuant to 10 CFR 50.55a(g)(6)(ij).

Therefore, pursuant to 10 CFR 50.55a(a)(3)(i) and 10 CFR 50.55a(g)('(i)) of the Commission's regulations, TVA is granted the following requested reliefs from the Code, as documented in the enclosed SE: ISI-1, ISI-3 to ISI-6, ISI-8 to ISI-10, and ISI-13. Where the relief status is "Granted with augmented requirements," the augmented requirements are as stated in the SE. The granting of these relief requests is contingent upon all other requirements of Section XI being met for inservice examinations, 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 SE. We conclude that (1) the Unit 1 ISI Program, Revision 14, with the additional information in the January 25 and July 12, 1990 letters and (2) the reliefs granted constitute part of the basis for TVA

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,

Original signed 'y Suzanne Black or

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

Distribution Docket File NRC PDR Local PDR S. Varga G. Lainas F. Hebdon S. Black W. Little M. Krebs J. Donohew C. Y. Cheng D. Smith OGC E. Jordan ACRS(10) N Rdg. File

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