TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401 400 Chestnut Street Tower II

September 18, 1984

Director of Nuclear Reactor Regulation Attention: Ms. E. Adensam, Chief Licensing Branch No. 4 Division of Licensing

U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of Tennessee Valley Authority Docket Nos. 50-327 50-328

By my July 30, 1984 letter to you, we submitted a request for the Sequoyah Nuclear Plant for relief of the hydrostatic test requirements specified in the 1977 Edition, Summer 1978 Addenda of Section XI of the ASME Code. As discussed with Carl Stahle of your staff and George Johnson of the NRC in a telephone discussion on September 17, 1984, we are revising that request for relief. Enclosed is a revised justification for relief in the hydrostatic test requirements. This relief is similar to that previously granted by the April 12, 1984 letter from Thomas M. Novak to H. G. Parris for installation of a bypass line around feedwater check valves.

If you have any questions concerning this matter, please get in touch with Jerry Wills at FTS 858-2683.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager Nuclear Licensing

Sworn to and subscribed before me this day of Sept. 1984

Notary Public

My Commission Expires

Enclosed

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Mr. James P. O'Reilly Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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ENCLOSURE

REVISED JUSTIFICATION FOR RELIEF REQUEST

COMPONENTS

Sequoyah Nuclear Plant units 1 and 2 feedwater system. Installation of 2-inch bypass lines around 16-inch feedwater check valves 3-508, 3-509, 3-510, and 3-511 (drawings attached) in accordance with TVA ECN L5024.

Deletion of 1-1/2-inch feedwater drain valves 3-512, 3-513, 3-516, 3-517, 3-520, 3-521, 3-524, and 3-525 (drawings attached). These valves are to be eliminated and the lines will be capped utilizing 1-1/2-inch socket welds.

CLASS

TVA safety Class B, ANSI B31.7; ASME Class 2 equivalent.

INSPECTION REQUIREMENTS

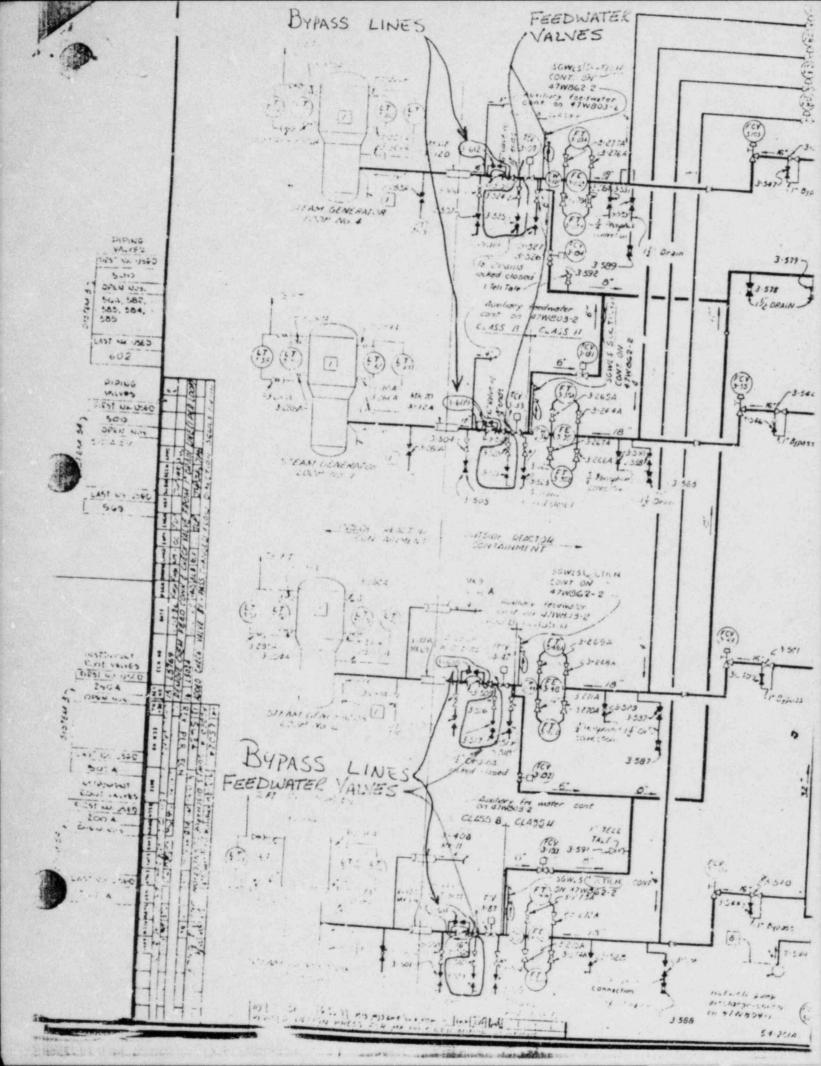
The code of record for repairs and replacements at Sequoyah is the 1980 Edition, Winter 1981 Addenda of ASME Section XI. This requires a hydrostatic pressure test of the replaced components. The pressure test program is to the 1977 Edition, Summer 1978 Addenda and requires the hydrostatic pressure test be performed at 1.25 times the system pressure Psv.

BASIS FOR RELIEF

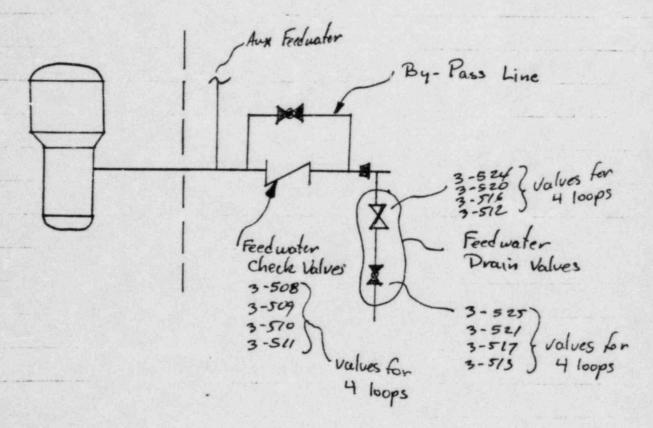
To accomplish the hydrostatic pressure test would require flooding the secondary side of each steam generator along with the 32-inch main s' am lines to the outboard isolation valves. The main steam safety and pc_erceperated relief valves would also require gagging to perform the test. The number of secondary side hydrostatic pressure tests allowed by the plant technical specifications (Section 5.7, Table 5.7.1) is 5. This does not allow for hydrostatic pressure tests other than the normally scheduled ones. It is our opinion that a significant increase in safety would not result from the hydrostatic pressure test over proposed alternate inspection below. For unit 1, steam generator loops 1 and 4 will be modified as soon as practical and loops 2 and 3 will be modified during the cycle 3 outage. For unit 2, all of the valves will be deleted and the lines modified during the cycle 2 outage scheduled to begin September 21, 1984.

ALTERNATE INSPECTION

In addition to the construction code (B31.7, 1969 Edition, Summer 1970 Addenda) surface examination of the welds, and in-service leak check of the subject welds will be performed at operating pressure during startup from the outage in which modification is made. The regularly scheduled system hydrostatic pressure test should be performed in 1989-1990 for unit 1 and 1990-1991 for unit 2.



Sketch of Typical Value Arrangement For 1 Steam Generator Loop



REF Dugs: 47W803-1 47W803-2