



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

September 21, 1992

Docket Nos. 50-327  
and 50-328

Tennessee Valley Authority  
ATTN: Dr. Mark O. Medford, Vice President  
Nuclear Assurance, Licensing & Fuels  
3B Lookout Place  
1101 Market Street  
Chattanooga, Tennessee 37402-2801

Dear Dr. Medford:

SUBJECT: SEVEN REQUESTS FOR RELIEF FROM THE AMERICAN SOCIETY OF  
MECHANICAL ENGINEERS SECTION XI CODE, HYDROSTATIC PRESSURE TEST  
REQUIREMENTS, SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2, REQUEST FOR  
ADDITIONAL INFORMATION (TAC NOS. M8139 AND M81540)

By letter dated August 30, 1991, the Tennessee Valley Authority (TVA),  
submitted seven requests for relief from the American Society of Mechanical  
Engineers (ASME) Code, Section XI. Relief was requested from performing the  
Code-required hydrostatic pressure tests of small sections of Class 2 piping  
between certain specified inboard and outboard containment isolation valves.  
The requests were designated ISPT-2, ISPT-3, ISPT-4, ISPT-5, ISPT-6, ISPT-7  
and ISPT-8.

No alternative examinations were proposed because the structural integrity of  
the subject piping would be verified during testing performed under the  
provisions of 10 CFR 50, Appendix J.

We have evaluated the relief requests and determined that they cannot be  
granted based on the information supplied, since sufficient documentation  
showing specifically why the hydrostatic tests cause a hardship was not  
supplied. Information, including isometric drawings pertaining to  
upstream and downstream Code-required tests that could be performed coincident  
with the subject tests, or an explanation of why this is impractical, was not  
supplied.

The justification that was supplied included discussions of the costs  
associated with Code-required examinations and of the reduction in  
personnel radiation exposure. These costs do not constitute a basis for  
granting relief. The estimated reduction in personnel radiation exposure was  
not sufficiently detailed, and appears to be disproportionately large when  
considering generally accepted ALARA guidelines.

In lieu of these reliefs, it is suggested that TVA review Code Case N498,  
since its application to these hydrostatic test requirements may be desirable.  
This Code Case was recently approved by the NRC and incorporated into  
Regulatory Guide 1.147, dated May 13, 1992.

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Dr. Mark O. Medford

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In summary, the staff requests that TVA re-evaluate the subject relief requests and provide either additional technical information, or a letter withdrawing the relief requests in favor of implementing Code Case N498 requirements.

This requirement affects 9 or fewer respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by

David E. LaBarge, Senior Project Manager  
Project Directorate II-4  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

cc: See next page

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