Tennessee Valley Authority, Post Office Box 2000, Soddy Daisy, Tennessee 37379-2000

Masoud Bajestani Site Vice President Seguoyah Nuclear Plant

July 8, 1997

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Gentlemen:

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

SEQUOYAH NUCLEAR PLANT (SQN) - COMMITMENTS REGARDING GENERIC LETTER (GL) 89-10 PROGRAM CLOSURE

On June 9 through June 19, 1997, NRC conducted an inspection (Inspection Report 97-06) of SQN's GL 89-10 program. The inspection team identified nine long-term actions to improve SQN's GL 89-10 program. These actions are as follows:

- 1. Strengthen group valve factors
- 2. Validate Pratt butterfly calculations
- 3. Update valve switch setting sheets
- Velan globe valve factor reconcile with test data
- 5. PORV block valve additional justification needed for blowdown conditions
- 6. Provide plan to verify orientation and run PPM on 1,2-FCV 72-2 and -39
- 7. Addition of 5 percent margin for valve degradation to the calculations
- Limit switch control provide 10 percent rate of loading until further evaluation is available
- 9. Provide plan for 2-FCV-68-332/333 actuator structural capability

NRC requested that TVA provide a commitment letter describing TVA's plans for addressing these long-term actions. The inspection team indicated that the NRC staff would evaluate SQN's GL 89-10 program for closure upon receipt of this commitment letter.

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Enclosed are TVA commitments that describe TVA's plans for addressing the nine long-term actions. In addition, TVA plans to provide a status letter by the end of December 1997 to inform you of progress in completing the long-term commitments. Notification will be provided in the December letter regarding the anticipated date for completion of any remaining commitments that would extend into 1998.

TVA requests that NRC provide notification of SQN's GL 89-10 program status following your review of the enclosed information.

If you have questions concerning this issue, please contact D. V. Goodin at (423) 843-7734.

Sincerely,

Masoud Bajestani

Enclosure

cc: Mr. R. W. Heman, Project Manager
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NRC Resident Inspector Sequoyah Nuclear Plant 2600 Igou Ferry Road Soddy-Daisy, Tennessee 37379-3624

Regional Administrator U.S. Nuclear Regulatory Commission Region II Atlanta Federal Reserve 61 Forsyth St., SW, Suite 23T85 Atlanta, Georgia 30303-3415

ENCLOSURE SEQUOYAH NUCLEAR PLANT TVA COMMITMENTS

1. Action:

Strengthen group valve factors for gate valves.

Commitment:

TVA will revise gate valve calculations to incorporate a 0.6 valve factor unless differential pressure test data is available to indicate a valve factor other that 0.6. This commitment will be completed by November 7, 1997.

Note: For any gate valve groups that have less than acceptable differential pressure (dp) test data to support a 0.6 valve factor, TVA plans to evaluate industry dp test data to justify existing valve stors.

2. Action:

Validate the Pratt butterfly calculations.

Commitment:

TVA wili participate in a butterfly valve test program with Duke Power Company or obtain appropriate test data from other sources (i.e., Kalsi Engineering or Duke Engineering Services) to validate Pratt design information. The validation will be completed by December 31, 1997.

Note: TVA has reevaluated the data associated with SQN's GL 89-10 butterfly valves. This reevaluation determined that the available margin for these valves is greater than 30 percent.

Action: Update valve switch-setting sheets.

Commitment: TVA will issue a design change notice (DCN) to update the valve

switch-setting sheets after calculations are completed. The

DCN for both units will be completed by December 1, 1997.

4. Action: Reconcile Velan 1.0 globe valve factor (closing) with test data.

Commitment: TVA will review differential pressure test data to determine if a

factor of 1.0 (in the closing direction) is appropriate for SQN's

Velan globe valves. The review will be completed by

September 30, 1997.

5. Action: Provide additional justification for SQN's PORV block valve

capability under blowdown conditions.

Commitment: TVA will perform maintenance improvements (e.g., radius

internal valve edges, check internal valve clearances, ensure

proper alignment, inspect valve seat, etc.) and perform the EPRI

Performance Prediction Program (PPP) for SQN's PORV block

valves. This commitment will be complete for Unit 2 before

restart from the Unit 2 Cycle 8 refueling outage (currently

scheduled for November 4, 1997). This commitment will be

complete for Unit 1 before restart from the Unit 1 Cycle 9

refueling outage (currently scheduled for October 19, 1998).

6. Action: Provide a plan to verify orientation and perform PPM on

1,2-FCV-72-2,-39.

Commitment: TVA will determine improvements (i.e., obtain additional test

data or perform the EPRI PPP) for valve factors and other

margins associated with these valves. This commitment will be

completed by September 30, 1997.

7. Action: Provide a 5 percent margin for valve degradation to SQN's

valve calculations.

Commitment: TVA will add a 5 percent margin as a minimum requirement

for valve degradation. This commitment will be completed by

November 7, 1997.

8. Action: Provide a 10 percent rate of loading (ROL) for limit switch

control until further evaluation is available.

Commitment: TVA will add a 10 percent margin for ROL (until further

evaluation is available). This commitment will be complete by

November 7, 1997.

9. Action: Provide plan for 2-FCV-68-332/333 actuator structural capability.

Commitment: TVA will revise SQN calculations to provide an increase in the

torque rating. This commitment will be complete by November 7,

1997.

 Commitment: TVA will submit a progress letter to NRC to provide an up-to-date status of the commitments described above. This letter will be submitted by December 31, 1997.