



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 18, 2022

Jeff Sowa, Site Licensing Manager
Tennessee Valley Authority
Sequoyah Nuclear Plant
P.O. Box 2000
Soddy Daisy, TN 37384

SUBJECT: REQUEST FOR SUPPLEMENTAL INFORMATION – REQUEST FOR EXEMPTION FROM VARIOUS 10 CFR PART 72 REGULATIONS RELATED TO NON-DESTRUCTIVE EXAMINATION COMPLIANCE, SEQUOYAH NUCLEAR PLANT INDEPENDENT SPENT FUEL STORAGE INSTALLATION [ENTERPRISE PROJECT IDENTIFICATION NUMBER L-2022-LLE-0027]

Dear Jeff Sowa:

By letter dated August 4, 2022 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML22216A078), Tennessee Valley Authority (TVA) submitted to the U.S. Nuclear Regulatory Commission (NRC) an exemption request for the Sequoyah Nuclear Plant (SQN) Independent Spent Fuel Storage Installation (ISFSI), in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 72.7, "Specific exemptions," from the requirements of 10 CFR 72.212(a)(2), 72.212(b)(3), 72.212(b)(5)(i), 72.212(b)(11) and 72.214.

In particular, the exemption request would, if granted, permit SQN ISFSI to deviate from conditions of the NRC Certificate of Compliance (CoC) No. 1032, Amendment No. 3 (ADAMS Accession No. ML17214A039), Appendix B, Section 3.3, "Codes and Standards," which specifies American Society of Mechanical Engineers Boiler and Pressure Vessel Code, 2007 Edition (ADAMS Accession No. ML16280A019), as the governing Code for the Holtec International Storage Module Flood and Wind (HI-STORM FW) Multi-Purpose Canister (MPC) system. The Code requires that 100 percent of the weld seam joining shell-to-shell of the MPC be inspected by radiography test (RT). More specifically, HI-STORM FW MPC-37 Serial Number 234, which is currently in use at SQN, does not meet the requirements of CoC No. 1032, Amendment No. 3, Appendix B, Section 3.3, as there is no supporting documentation available for a RT examination following a weld repair¹. Consequently, TVA requested the subject exemption so that it could continue storing spent fuel in the relevant MPC at SQN ISFSI.

As part of the screening process, the NRC staff performed an acceptance review of TVA's exemption request and determined that the submittal did not provide technical information in sufficient detail to enable the NRC staff to proceed with detailed technical review. The NRC staff has identified that additional supplemental information, as specified in the enclosure, is needed

¹ During a review of manufacturing documents, the manufacturer (i.e., Holtec) identified that MPC-37 Serial Number 234 at SQN ISFSI has a MPC longitudinal shell-to-shell weld that may not have been properly digitally radiographed after a weld repair. When TVA was notified of this issue, MPC-37 Serial Number 234 was already in use at SQN ISFSI and was registered for the initial storage use of the cask system on February 4, 2022 (ADAMS Accession No. ML22059B061), in accordance with 10 CFR 72.212, "Conditions of General License Issued Under §72.210," paragraph (b)(2).

to continue with the review. Your response to the staff's request for supplemental information (RSI) should be provided to the NRC within 30 days from the date of this letter. On November 1, 2022 (ADAMS Accession No. ML22314A169), the NRC staff conducted a conference call with TVA representatives for the purpose of clarifying the draft RSI questions, to ensure that they are clear, prior to formal issuance to TVA.

The subject submittal has been assigned Enterprise Project Identification Number (EPID) L-2022-LLE-0027. Please reference this number and docket numbers 50-327, 50-328, and 72-34 in any future correspondence associated with this exemption request.

In accordance with Title 10 of the *Code of Federal Regulations*, Section 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of the NRC's ADAMS. ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have any questions regarding this communication, please contact me at 404-997-4730 or email to tilda.liu@nrc.gov.

Sincerely,

Tilda Liu

Tilda Liu, Senior Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket Nos.: 50-327, 50-328, and 72-034

EPID No.: L-2022-LLE-0027

Enclosure:
Request for Supplemental Information

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DATED: November 18, 2022

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