



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

NOV 15 1999

10 CFR 50.55(a)

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

Gentlemen:

In the Matter of ) Docket No. 50-390  
Tennessee Valley Authority )

WATTS BAR NUCLEAR PLANT (WBN) UNIT 1 - AMERICAN SOCIETY OF  
MECHANICAL ENGINEERS (ASME) SECTION XI INSERVICE TESTING PROGRAM  
REQUEST FOR RELIEF PV-15, REVISION 1 AND PV-16

The purpose of this letter is to request relief from ASME Section XI Code requirements. In a letter dated November 20, 1995, TVA requested relief from certain testing requirements for two essential raw cooling water (ERCW) system valves and two reactor coolant system (RCS) valves. This relief request's unique identifier was PV-15. NRC approved PV-15 in NRC's Supplemental Safety Evaluation Report (SSER) 20 (NUREG-0847) for WBN dated February 1996.

By this letter, TVA is revising PV-15 to split the systems into two separate relief requests. PV-15, Revision 1, will be a revised request for the same two RCS valves, 1-FSV-68-396-B and 1-FSV-68-397-A in PV-15, Revision 0. The ERCW system valves, 0-FSV-67-1221-A and 0-FSV-67-1223-B in PV-15, Revision 0, are being submitted as a new relief request, PV-16. This revision is needed because the revised proposed alternatives for the Code requirement are different. Therefore, pursuant to 10 CFR 50.55a(f)(5)(iii),

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U.S. Nuclear Regulatory Commission

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TVA requests NRC's approval of the revised alternatives. TVA considers the proposed alternate testing to provide an adequate level of assurance of operational readiness and an acceptable level of quality and safety.

Enclosure 1 provides the revised relief requests PV-15, Revision 1 for the RCS valves. Enclosure 2 provides the new relief request PV-16 for the ERCW valves. Relief request PV-16 is similar to TVA's Sequoyah Nuclear Plant (SQN) relief request which was submitted to the NRC November 21, 1995 entitled "Second Ten-Year Interval Inservice Testing Program for Pumps and Valves," Relief Request RV-2. The SQN Relief Request RV-2, was approved by NRC's letter "Inservice Testing Program Relief Requests, Second Ten-Year Interval Sequoyah Nuclear Plant Units 1 and 2 (TAC NOS. M94117 and M94118) dated March 20, 1996, Section 4.2, "Valve Relief Request RV-2."

TVA requests that NRC review and approve the revised relief requests by April 30, 2000. These relief requests are needed for the third refueling outage which is schedule to begin in September 2000. If you should have any questions concerning this matter, please contact me at (423) 365-1824.

Sincerely,



P. L. Pace  
Manager, Site Licensing  
and Industry Affairs

Enclosures

cc See Page 3

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NOV 15 1999

cc: (Enclosures):

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Region II  
Atlanta Federal Center  
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Atlanta, Georgia 30303

ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1  
RELIEF REQUEST PV-15, Revision 1

ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1  
REVISED RELIEF REQUEST  
PV-15, REVISION 1

- I. **Relief Request Number** - PV-15, Revision 1
- II. **Affected System(s)** - Reactor Coolant System
- III. **Affected Component(s)** - 1-FSV-68-396-B,  
1-FSV-68-397-A  
(1-47W813-1 - attached)
- IV. **ASME Code Class** - 1
- V. **Category** - B-Active
- VI. **Function of Affected Component(s)** - The affected valves are the reactor coolant head vent throttle valves. These valves are throttled open by operator action to control the rate at which non-condensable gases and hydrogen are vented from the reactor vessel following an accident.
- VII. **ASME Code Test Requirement** - OM Standard, Part 10 (OM-10), Paragraph 4.2.1.4(b), "The stroke time of all power operated valves shall be measured to at least the nearest second."
- VIII. **Basis for Granting Relief** - These two valves are totally enclosed [seal welded bonnet], one-inch Target Rock solenoid valves, which prevents local confirmation of valve position. Design requirements impose a minimum stroke time limitation on these valves of not faster than 5 seconds. These valves are remotely positionable throttle valves with a thumb-wheel actuated controller that positions the valve. Restricting the stroke time to not less than 5 seconds effectively prohibits stroke timing the valve because the valve is capable of stroking considerably faster than the 5 second limit. Even if the 5 second limit did not exist, stroke timing of the valve using its thumb-wheel actuated controller would result in timing the ability of the operator to turn the thumb-wheel and not the ability of the valve to move.

An enhanced maintenance program of disassembly and inspection of valve internal parts was evaluated. This method was not considered appropriate for the following reasons:

- [1] Frequent disassembly can lead to distortion of the valve parts caused by the repetitive welding process to reinstall the seal weld. This distortion could cause unacceptable operational seat leakage, binding of internal parts, and other operational problems.

ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1  
REVISED RELIEF REQUEST  
PV-15, REVISION 1

- [2] The physical appearance of the internal parts does not always provide clear and evident verification of acceptable valve operation.

**IX. Proposed Alternative** - TVA proposes to utilize an enhanced maintenance program based on the following attributes:

- [1] Periodic replacement of critical valve parts [i.e., the linear voltage differential transformer (LVDT) that provides valve position indication feedback, the coil that operates the valve, and the valve's electrical terminal board] is in accordance with TVA's environmental qualification binder for the valve. The current schedule for valve part replacement is every 132 months for the LVDT, every 294 months for the coil, and every 432 months for the valve terminal board.
- [2] Calibration of the valve's position control system is performed each refueling outage. This calibration involves utilizing the valve controller to position the valve at various positions and utilizing the LVDT to determine the valve stem position. These are compared to ensure valve operation is as expected.

In addition to the enhanced maintenance program, tests will be conducted as follows to provide positive verification of the valve's ability to fulfill its specific function:

- [1] Full stroke exercise of each valve is performed during shutdowns under the provisions of Paragraphs 4.2.1.2(f) and 4.2.1.2(g) of OM-10. This test consists of cycling the valve controller through one complete cycle and verifying [using the valve position indicator operated by the LVDT attached to the valve stem] that the valve cycles through one full cycle in response to the valve controller.
- [2] During refueling outages, in addition to cycling the controller through one complete cycle and using the valve position indicator to verify valve travel, supplement the verification of valve travel by (a) ensuring no detectable flow is present through the valves with the valves closed, (b) ensuring that with each valve open flow is present, and (c) ensuring that when each valve is returned to the closed position no detectable flow is present. The presence or absence of flow is verified by monitoring a change in a process perimeter either the valve tail pipe temperature for an increase/decrease or the pressurizer

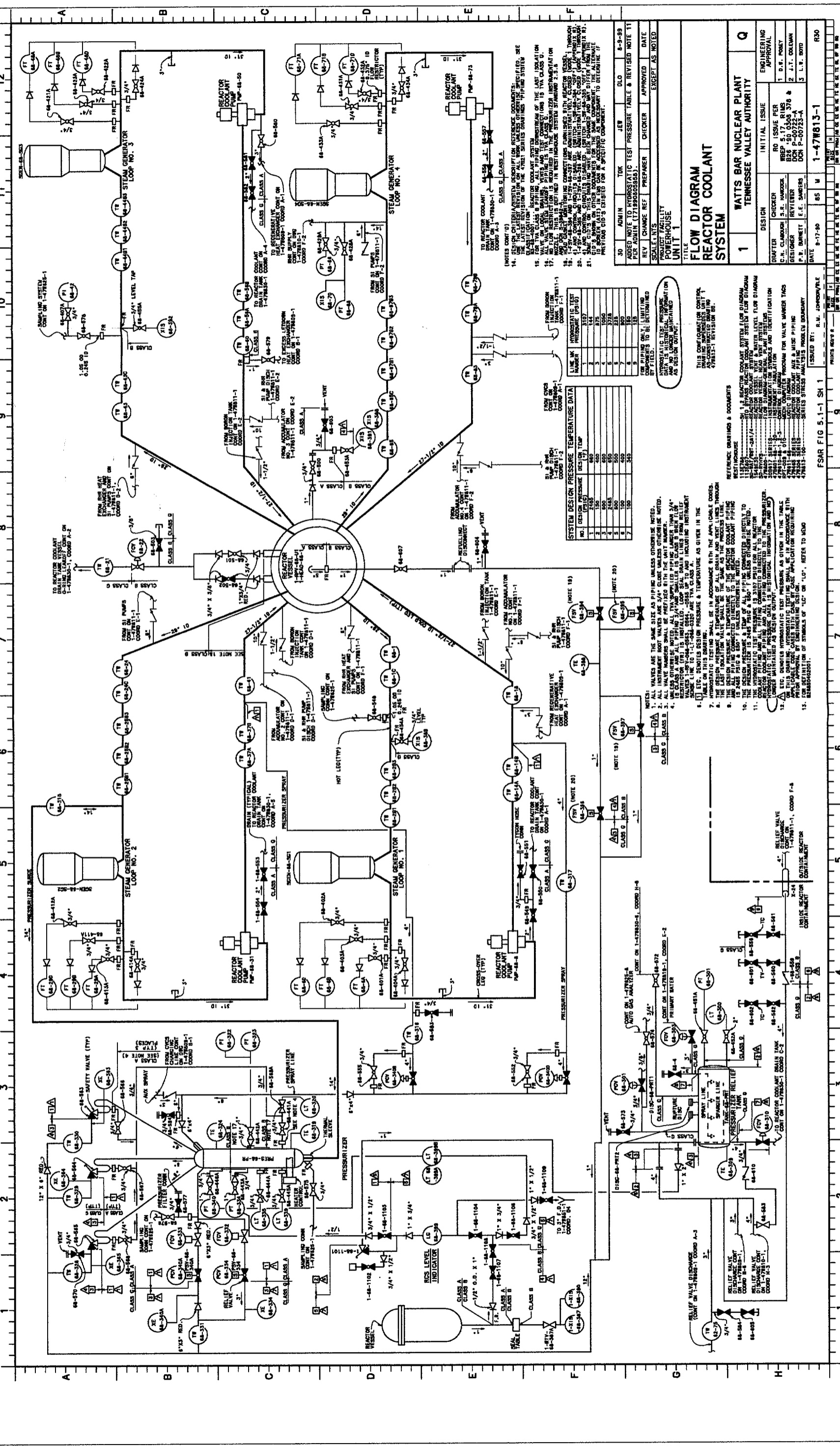
ENCLOSURE 1

WATTS BAR NUCLEAR PLANT UNIT 1  
REVISED RELIEF REQUEST  
PV-15, REVISION 1

relief tank [to which the valves discharge] for a temperature increase/decrease or level increase/no change. This additional verification which is consistent with OM-10, Paragraph 4.2.1.3, Valve Obturator Movement, ensures the valve disk is still attached to the stem and is capable of controlling flow.

**X. Frequency of Proposed Alternative** - Each refueling outage.

1-47813-1



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DESIGNED BY: (UNCLASSIFIED) TEST PRESSURE TABLE & REVISED NOTE 11					
PER ADMIN (17180000000)					
REV	CHANGE REF	PREPARED	CHECKER	APPROVED	DATE
SCALE	UNITS	EXCEPT AS NOTED			
POWERHOUSE					
UNIT 1					
FLOW DIAGRAM REACTOR COOLANT SYSTEM					
1 WATTS BAR NUCLEAR PLANT TENNESSEE VALLEY AUTHORITY					
DRFTER	CHECKER	DESIGNER	INITIAL ISSUE	ENGINEERING APPROVAL	
C.N. CLAMON	S.R. HANCOCK	R.B.P. PER	RB ISSUE PER	1 D.R. POSEY	
DESIGNED	REVISOR	DESIGNER	DESIGNER	2 J.T. COLMAN	
P.E. BURNETT	E.E. SANDERS	DESIGNER	DESIGNER	3 L.R. BOND	
DATE	8-17-80	65	M	1-47813-1	
ISSUED BY: R.H. LINDENBAUM					
PRINTED BY: (UNCLASSIFIED)					

NO.	DESCRIPTION	DESIGN PRESSURE (PSIG)	TEMP.
1	REACTOR VESSEL	1157	550
2	STEAM GENERATOR	1157	550
3	REACTOR COOLANT PUMP	1157	550
4	REACTOR COOLANT PUMP	1157	550
5	REACTOR COOLANT PUMP	1157	550
6	REACTOR COOLANT PUMP	1157	550
7	REACTOR COOLANT PUMP	1157	550
8	REACTOR COOLANT PUMP	1157	550
9	REACTOR COOLANT PUMP	1157	550
10	REACTOR COOLANT PUMP	1157	550

- NOTES:
1. VALVES ARE THE SAME SIZE AS PIPING UNLESS OTHERWISE NOTED.
  2. ALL INSTRUMENT NOT VALVES ARE 3/4" UNLESS OTHERWISE NOTED.
  3. ALL INSTRUMENT NOT VALVES ARE 3/4" UNLESS OTHERWISE NOTED.
  4. ALL INSTRUMENT NOT VALVES ARE 3/4" UNLESS OTHERWISE NOTED.
  5. ALL INSTRUMENT NOT VALVES ARE 3/4" UNLESS OTHERWISE NOTED.
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  11. ALL INSTRUMENT NOT VALVES ARE 3/4" UNLESS OTHERWISE NOTED.
  12. ALL INSTRUMENT NOT VALVES ARE 3/4" UNLESS OTHERWISE NOTED.
  13. ALL INSTRUMENT NOT VALVES ARE 3/4" UNLESS OTHERWISE NOTED.

NO.	DESCRIPTION	DESIGN PRESSURE (PSIG)	TEMP.
1	REACTOR VESSEL	1157	550
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7	REACTOR COOLANT PUMP	1157	550
8	REACTOR COOLANT PUMP	1157	550
9	REACTOR COOLANT PUMP	1157	550
10	REACTOR COOLANT PUMP	1157	550

- REFERENCES & DOCUMENTS:
- 1. WATTS BAR NUCLEAR PLANT SYSTEM FLOW DIAGRAM
  - 2. WATTS BAR NUCLEAR PLANT SYSTEM FLOW DIAGRAM
  - 3. WATTS BAR NUCLEAR PLANT SYSTEM FLOW DIAGRAM
  - 4. WATTS BAR NUCLEAR PLANT SYSTEM FLOW DIAGRAM
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  - 12. WATTS BAR NUCLEAR PLANT SYSTEM FLOW DIAGRAM
  - 13. WATTS BAR NUCLEAR PLANT SYSTEM FLOW DIAGRAM

NO.	DESCRIPTION	DESIGN PRESSURE (PSIG)	TEMP.
1	REACTOR VESSEL	1157	550
2	STEAM GENERATOR	1157	550
3	REACTOR COOLANT PUMP	1157	550
4	REACTOR COOLANT PUMP	1157	550
5	REACTOR COOLANT PUMP	1157	550
6	REACTOR COOLANT PUMP	1157	550
7	REACTOR COOLANT PUMP	1157	550
8	REACTOR COOLANT PUMP	1157	550
9	REACTOR COOLANT PUMP	1157	550
10	REACTOR COOLANT PUMP	1157	550

CONFIGURATION CONTROL DRAWING

PROCDAM MAINTAINED DRAWING

THIS DRAWING IS THE PROPERTY OF THE TENNESSEE VALLEY AUTHORITY

ISSUED BY: R.H. LINDENBAUM

PRINTED BY: (UNCLASSIFIED)

DATE: 8-17-80

SCALE: UNITS EXCEPT AS NOTED

APPROVED: (UNCLASSIFIED)

DESIGNED BY: (UNCLASSIFIED)

PER ADMIN (17180000000)

1-47813-1



ENCLOSURE 2

WATTS BAR NUCLEAR PLANT UNIT 1

RELIEF REQUEST PV-16

ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1  
REQUEST FOR RELIEF, PV-16

- I. **Relief Request Number** - PV-16
- II. **Affected System(s)** - Essential Raw Cooling Water
- III. **Affected Component(s)**: 0-FSV-67-1221-A (1-47W845-4 attached)  
0-FSV-67-1223-B (1-47W845-7 attached)
- IV. **ASME Code Class** - Class 3-Active
- V. **Valve Category** - Category B
- VI. **Function of Affected Component(s)**

Valves open to admit cooling water to the jackets and aftercooler of the auxiliary air compressors.

VII. **ASME Code Testing Requirement**

The following sections in OM Standard, Part 10:

Paragraph 4.2.1.4(a), "The limiting value(s) of full-stroke time of each power-operated valve shall be specified by the Owner,"

Paragraph 4.2.1.4(b), "The stroke time of all power operated valves shall be measured to at least the nearest second", and

Paragraph 4.2.1.9(b), "Valves with measured stroke times which do not meet the acceptance criteria of paragraph 4.2.1.8 shall be immediately retested or declared inoperable. If the valve is retested and the second set of data also does not meet the acceptance criteria, the data shall be analyzed within 96 hours to verify that the new stroke time represents acceptable valve operation, or the valve shall be declared inoperable. If the second set of data meets the acceptance criteria, the cause of the initial deviation shall be analyzed and the results documented in the record of tests."

- VIII. **Basis for Granting Relief** - These solenoid valves are mounted on the auxiliary air compressor skid. These valves are totally enclosed, solenoid actuated valves manufactured by Target Rock and have no remote position indication. The inability to see any moving parts of the valve prevents visual confirmation of valve position. This, in conjunction with the lack of remote position indication, prevents direct measurement of the stroke time of the valve.

Additionally, the air compressors have a thermostatic valve, installed in series with these solenoid valves, that modulates in response to system temperature. The thermostatic valve does

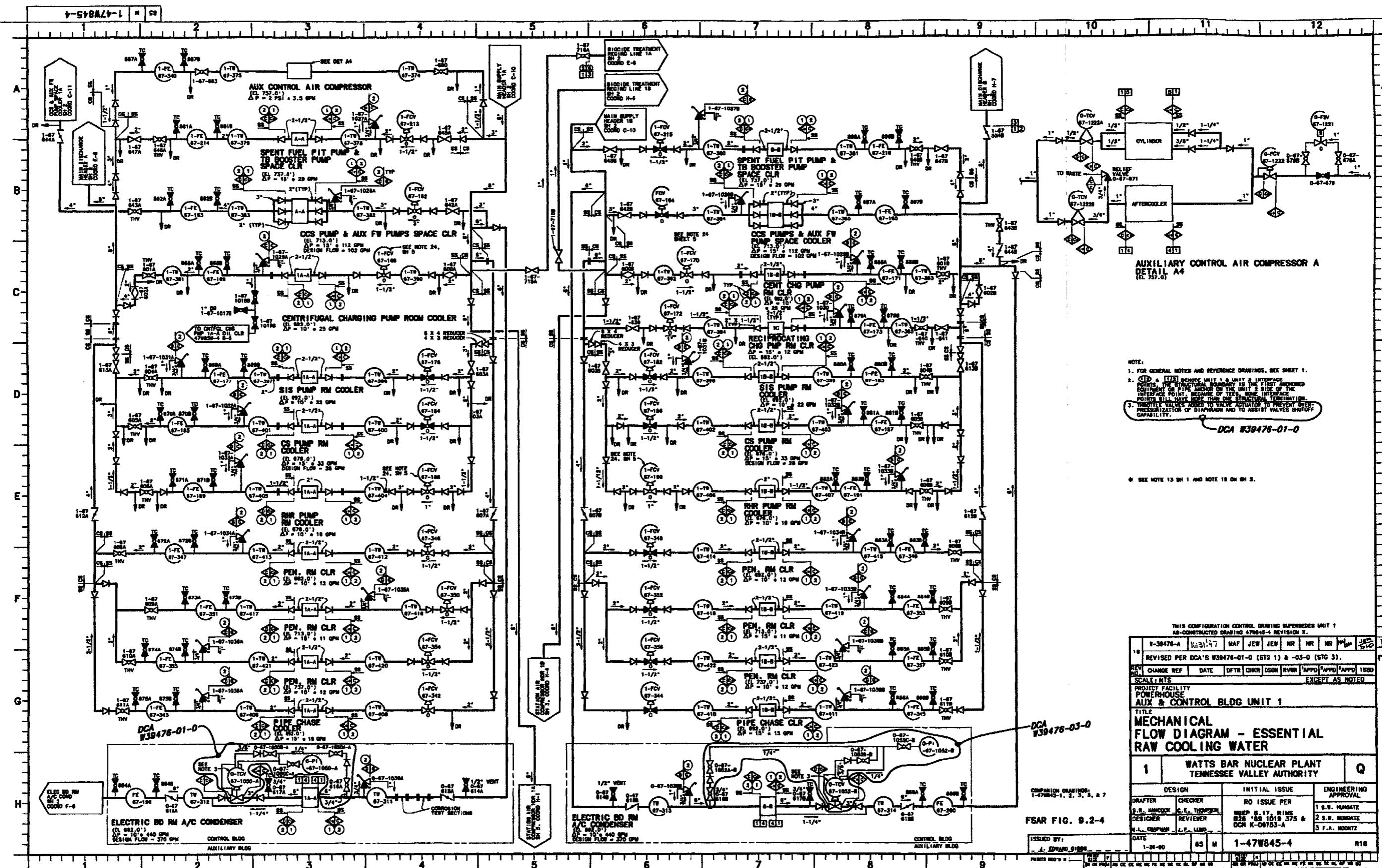
ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1  
REQUEST FOR RELIEF, PV-16

not start opening until air compressor temperatures are elevated. Until air compressor temperatures have risen sufficiently to open the thermostat, no cooling water flow exists to the compressor, even though the solenoid valves are open. Although a flow element is provided in the cooling water line, the presence of the thermostatic valve prevents use of the flow measurement as an indirect indication of solenoid valve stroke time.

As discussed in NUREG-1482," Guidelines for Inservice Testing at Nuclear Power Plants," Section 3.4, "Skid-Mounted Components and Component Subassemblies," when an individual component cannot be tested to the requirements of the OM-10, testing of the larger component [in this case, the auxiliary air compressor] ensures that the subcomponent is functioning properly. Demonstration of the ability of the auxiliary air compressors to operate without overheating will provide an adequate means for assuring operational readiness of cooling water supply valves 0-FSV-67-1221-A and 0-FSV-67-1223-B.

- IX. **Proposed Alternative** - Exercise the valves to the open position by operating the auxiliary air compressor and observing the discharge air and jacket water temperatures during compressor operation to ensure the temperatures are maintained at acceptable levels. This verifies that the cooling water supply solenoid valves operate to supply ERCW cooling water to the auxiliary air compressors.
  
- X. **Frequency of Proposed Alternative** - Quarterly.



NOTE:  
 1. FOR GENERAL NOTES AND REFERENCE DRAWINGS, SEE SHEET 1.  
 2. (1) & (2) DENOTE UNIT 1 & UNIT 2 INTERFACE POINTS. THE MECHANICAL BOUNDARY IS THE FIRST APPOINTED EQUIPMENT ON THE OTHER SIDE OF THE INTERFACE POINT. BEHIND OF THE INTERFACE POINT, THERE WILL BE MORE THAN ONE STRUCTURAL TERMINATION POINTS.  
 3. TRAP/RELIEF VALVES ADDED TO VALVE ACTUATION TO PREVENT OVER-PRESSURIZATION OF DIAPHRAGM AND TO ASSIST VALVES SHUT-OFF CAPABILITY.

DCA #39476-01-0

SEE NOTE 13 ON 1 AND NOTE 19 ON 5.

THIS CONFIGURATION CONTROL DRAWING SUPERSEDES UNIT 1 AS-CONSTRUCTED DRAWING 47845-4 REVISION 1.

REV	CHANGE	REF	DATE	DFTR	CHGR	DSGN	RVWR	APPR	ISSD	
10										
SCALE: NTS EXCEPT AS NOTED										
PROJECT FACILITY POWERHOUSE AUX & CONTROL BLDG UNIT 1										
TITLE <b>MECHANICAL FLOW DIAGRAM - ESSENTIAL RAW COOLING WATER</b>										
1 WATTS BAR NUCLEAR PLANT TENNESSEE VALLEY AUTHORITY Q										
DESIGN			INITIAL ISSUE			ENGINEERING APPROVAL				
DRAFTER S. B. HANCOCK			CHECKER C. E. THOMPSON			RO ISSUE PER WSEP 5.17, RIMS 828 '89 1019 375 & DCA K-06753-A		1 S.S. HARGATE		2 S.S. HARGATE
DESIGNER M. L. CHAPMAN			REVIEWER L. F. LUND			DATE 1-26-80		85 M		1-47W845-4
ISSUED BY: J. EDWARDS			DATE 1-26-80			85 M		1-47W845-4		R18

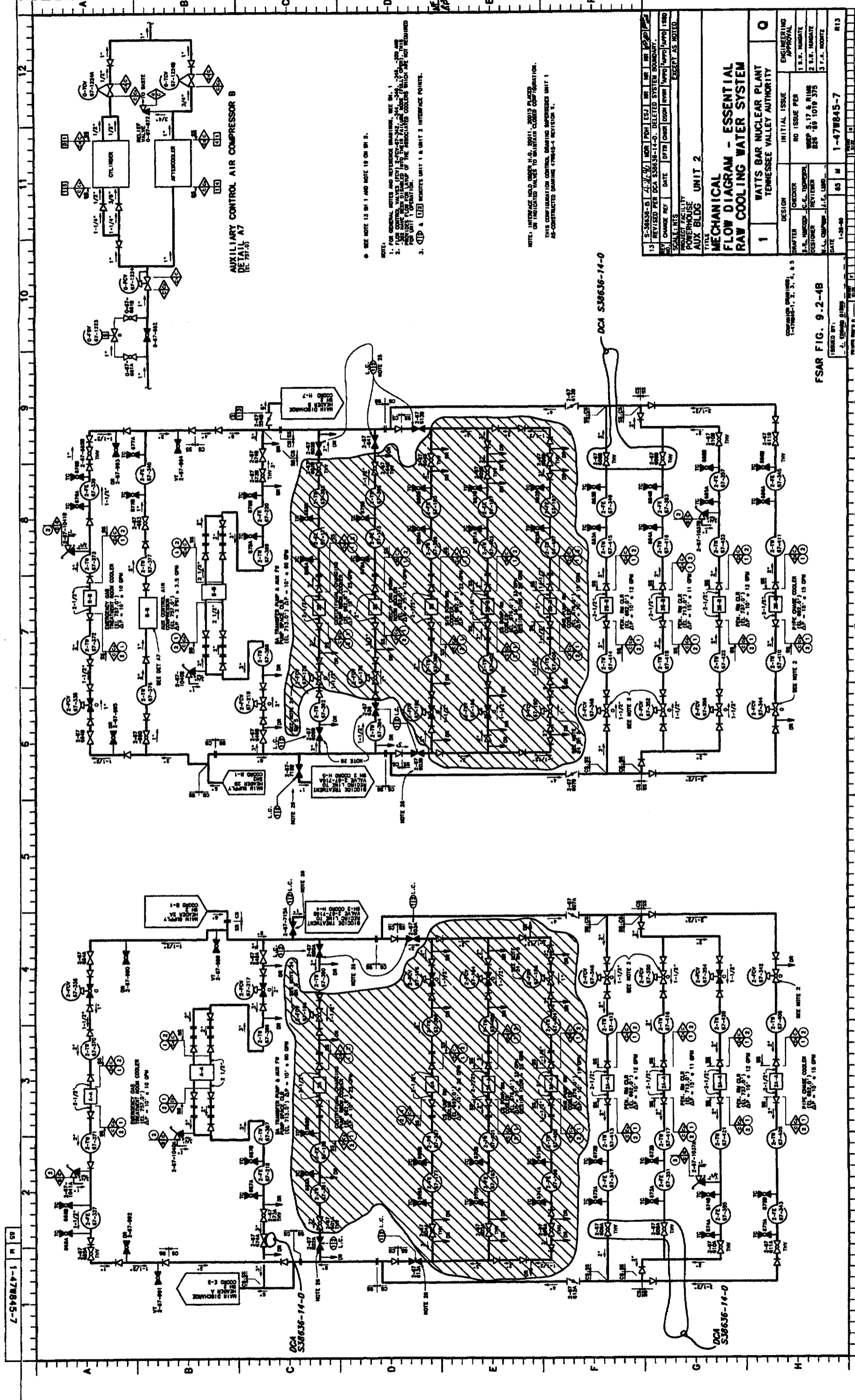
DCA #39476-03-0

COMPARISON DRAWINGS:  
1-47W845-1, 2, 3, 5, & 7

FSAR FIG. 9.2-4

PROCADAM MAINTAINED DRAWING  
THIS CONFIGURATION CONTROL DRAWING IS MAINTAINED BY THE  
MIS AND UNIT AND IS NOT PART OF THE TVA PROCEEDING EXHIBITS

CONFIGURATION CONTROL DRAWING



- NOTE: SEE NOTE 13 ON 1 AND NOTE 19 ON 5.
- NOTE:  
1. FOR GENERAL NOTES AND REFERENCE DRAWINGS, SEE SHEET 1.  
2. FOR GENERAL NOTES AND REFERENCE DRAWINGS, SEE SHEET 2.  
3. FOR GENERAL NOTES AND REFERENCE DRAWINGS, SEE SHEET 3.
- NOTE: INTERFACES WOULD BE PLACED ON INDICATED VALVES TO MAINTAIN CLOSED CONFIGURATION. THIS CONFIGURATION CONTROL SHOWN IS SUPERSEDED BY UNIT 1 AS-CONSTRUCTED DRAWING 47843-3 REVISION 1.
- ① & ② INDICATES UNIT 1 & UNIT 2 INTERFACE POINTS.

AUXILIARY CONTROL AIR COMPRESSOR B  
DETAIL AT 761.51

PROJECT FACILITY POWERHOUSE AUX BLDG	
TITLE MECHANICAL FLOW DIAGRAM - ESSENTIAL RAW COOLING WATER SYSTEM	
UNIT 2	
DESIGN	INITIAL ISSUE
CHECKER	NO ISSUE PER
DRAWN	E.S.R. HANARTE
DESIGNER	WSP 5.17 & RINE
REVIEWER	2 E.S. HANARTE
DATE	1-28-80
SCALE	AS SHOWN
DATE	1-28-80
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WATTS BAR NUCLEAR PLANT  
TENNESSEE VALLEY AUTHORITY

DESIGN  
INITIAL ISSUE  
NO ISSUE PER  
E.S.R. HANARTE  
WSP 5.17 & RINE  
2 E.S. HANARTE  
1-28-80  
1-47845-7

FSAR FIG. 9.2-4B

PRO-CADAM MAINTAINED DRAWING  
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CONFIGURATION CONTROL DRAWING