

August 8, 2006

Mr. Karl W. Singer  
Chief Nuclear Officer and  
Executive Vice President  
Tennessee Valley Authority  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

SUBJECT: SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING SNUBBER EXAMINATION AND  
TESTING (TAC NOS. MC9657 AND MC9658)

Dear Mr. Singer:

By letter dated January 25, 2006, Tennessee Valley Authority (the licensee) requested relief from the American Society of Mechanical Engineers Section XI Code requirements for snubber examination and testing. The proposed request for relief is a continuation of the previously approved relief request from the Sequoyah Nuclear Plant (SQN), Units 1 and 2 second 10-year inspection interval and was submitted for applicability during SQN's third 10-year inspection interval that began on June 1, 2006.

In order for the staff to complete its review of this application, we request that the licensee provide responses to the enclosed request for additional information (RAI). Based on discussions with your staff, we understand that you intend to respond to this RAI within 30 days of receipt of this letter.

Sincerely,

/RA/

Douglas V. Pickett, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-327 and 50-328

Enclosure: As stated

cc w/encl: See next page

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Mr. Karl W. Singer  
Tennessee Valley Authority

## **SEQUOYAH NUCLEAR PLANT**

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REQUEST FOR ADDITIONAL INFORMATION

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

SNUBBER RELIEF REQUEST

SNUBBERS INSPECTION AND TESTING FOR THIRD 10-YEAR INTERVAL

TAC NOS. MC9657 AND MC9658

1. The licensee requested relief from the requirements of IWF-5200(a) and (b), and IWF-5300(a) and (b) (Page E1-2). IWF-1220 states that "the inservice inspection requirements for snubbers shall be in accordance with the requirements of IWF-5000." Article IWF-5000 also contains requirements for snubber preservice and inservice examinations, and tests for snubbers integral and nonintegral attachments under IWF-5200(c) and IWF-5300(c). Please explain, whether and how the requirements of IWF-5200(c) and IWF-5300(c) will be met.
2. The licensee requested relief from IWF-5400, Repair/ Replacement Activities (Page E1-2). IWF-5400 states that "Repair/replacement activities performed on snubbers shall be in accordance with IWA-4000. Snubbers installed, corrected or modified by repair/replacement activities shall be examined and tested in accordance with the applicable requirements of IWF-5200 prior to return to service." Please explain, whether and how IWF-5200(c) requirements of IWF-5200 will be met.
3. IWF-5200(a) and (b), and IWF-5300(a) and (b) states that "preservice and inservice examination and testings shall be performed in accordance with ASME/ANSI OM, Part 4." Under Basis for Relief (Page E1-3), the licensee states that "Sequoyah Nuclear Plant (SQN) Technical Requirement Manual (TRM) adopts the provisions provided in NRC Generic Letter (GL) 90-09." GL 90-09, only provides guidance for Snubber Visual Examination Intervals and Corrective Actions. GL-90-09 does not replace any other requirements of OM Part 4. Therefore please explain the following:
  - 3a. OM-4, Section 2.1 requires preservice examination of snubbers. Please explain, how these preservice requirements are met in the proposed alternative SQN TRM.
  - 3b. OM-4, Section 3.1 requires preservice operability testing of snubbers. Please explain, how these preservice operability testing requirements are met in the proposed alternative SQN TRM.
4. On page E1-4, last paragraph, the licensee states that "Performance of each test or inspection is documented and retained with the site procedure as a summary report with the data similar to the requirements prescribed in the ASME Section XI Code. The licensee is to provide actual subsection and/or paragraph of ASME Section XI, which is intended to meet for this requirement of documentation.

Enclosure

5. Please explain, how the requirements of OM-4, Section 3.2.4 "Inservice Operability Failure Evaluation" are met in the proposed alternative as specified in the SQN TRM.