

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

May 15, 1981



Director of Nuclear Reactor Regulation  
Attention: Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Schwencer:

In the Matter of the Application of ) Docket No. 50-328  
Tennessee Valley Authority )

We have determined, during our review of Sequoyah Nuclear Plant unit 2 technical specifications, that the reactor coolant system boundary valves for the boron injection system (63-586, -587, -588, -589, and -581) do not form an interface between the high pressure reactor coolant and low pressure systems and should be excluded from the leak testing program. The piping is high pressure piping (2580 lb/in<sup>2</sup>g at 650°F and 2800 lb/in<sup>2</sup>g at 200°F) and the valves in these lines are designed to withstand reactor coolant system design pressure. ASME Section XI, 1974 Edition Summer 1975 Addenda requires this piping to be hydrostatic pressure tested (refer to IWB-5222 for Class I piping and IWC-5220 and IWC-2510 for Class II piping). Since there are other normally closed motor operated valves in the piping, it is TVA's position that no testing should be required to verify closure of these check valves.

It is TVA's position that the Residual Heat Removal (RHR) suction pressure isolation valves (FCV-74-1 and 2) should be tested according to the draft unit 2 technical specifications except at each disturbance due to valve actuation. The following justifications provide a basis for this exemption.

1. Full closure of these valves is verified in the control room by direct monitoring position indicator.
2. Inadvertent opening of these valves is prevented through interlocks which require the plant to be below RHR operating pressure before opening.

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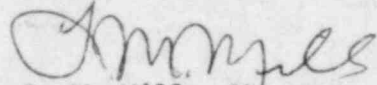
3. Gross leakages due to valve failure would be detected by increasing levels in the pressurizer relief tank.

Therefore, full closure of the RHR valves is verified after opening, inadvertent opening is prevented, and gross leakage can be readily detected.

If you have any questions, please get in touch with M. A. McBurnett at FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Regulation and Safety

Sworn to and subscribed before me  
this 15<sup>th</sup> day of May 1981

Paulette H. White  
Notary Public

My Commission Expires 9-5-84