

TENNESSEE VALLEY AUTHORITY

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JUL 13 1990

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

Gentlemen:

In the Matter of
Tennessee Valley Authority

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Docket Nos. 50-327
50-328

SEQUOYAH NUCLEAR PLANT (SQN) - NRC BULLETIN 88-10, NONCONFORMING MOLDED-CASE
CIRCUIT BREAKERS

- References:
1. TVA letter to NRC dated March 20, 1990, "Sequoyah Nuclear Plant (SQN) - NRC Bulletin 88-10, Nonconforming Molded-Case Circuit Breakers"
 2. TVA letter to NRC dated February 10, 1988, "Sequoyah Nuclear Plant (SQN) - Replacement Items Program (RIP) Supplemental Program Plan"

In Reference 1, TVA proposed no further reviews to identify maintenance direct-charge, molded-case circuit breakers procured between August 1983 and December 1984. The proposal was based upon the resource-intensive search of records that would be required, the high expectation that a quite small number of direct-charge breakers would be identified, and the high probability that surveillance testing was performed at the time of replacement. This submittal provides additional bases for TVA's proposal.

TVA has reviewed the list of molded-case circuit breakers that were identified as untraceable for SQN. Of the 250 breaker installations, only 3 were identified for the August 1983 to December 1984 period, and none of these were maintenance direct-charge breakers. There were 247 breaker replacements procured between January 1985 and August 1988. Out of these 247 breakers, 32 (13 percent) were maintenance direct-charge breakers. (This distribution can best be explained by the fact that the SQN restart effort between 1985 and 1988 included several major modifications resulting from the electrical calculations review and the ampacity issue.) The small ratio of 1985 to 1988 period direct-charge breakers to the total 1985 to 1988 period breakers, and the very small number of 1983 to 1984 stock replacements, suggest that the total number of direct-charge installations for August 1983 to December 1984 would also be quite small.

Additionally as noted in Reference 2, results from SQN's RIP indicate that 93 percent of maintenance replacements historically come from stock; the remaining 7 percent come from direct-charge procurement. This, too, supports the conclusion that there should be very few maintenance direct-charge breaker replacements from August 1983 to December 1984.

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TVA has also reviewed the contracts that purchased molded-case circuit breakers for SQN from 1983 to 1988. Of the 961 breakers purchased, only 52 breakers (less than six percent) were procured in 1983 and 1984. There were 909 breakers procured from 1985 to 1988. The small number of total breakers procured in 1983 and 1984 is another supporting basis for expecting very few direct-charge breaker installations from August 1983 to December 1984.

A preliminary review of TVA records indicates that approximately 15,000 work requests would have to be retrieved and evaluated to identify any additional direct-charge maintenance breaker replacements for the August 1983 to December 1984 period. TVA has concluded that no significant assurance would be expected from the additional resource expenditures.

No commitments are contained in this submittal. The information provided has been previously discussed by telephone with NRC staff. Please direct questions concerning this issue to Kathy S. Whitaker at (615) 843-7748.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

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