Tennessee Valley Authority ... ...ker Street, Chattanooga, Tennessee 37402

JUN 11 1991

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

Gentlemen:

In the Matter of) Docket No. 50-327
Tennessee Valley Authority

SEQUOYAH NUCLEAR PLANT (SQN) - TVA RESPONSE TO NRC SAFETY EVALUATION REPORT (SER) CONCERNING SQN'S UNIT 1 10-YEAR IN-SERVICE INSPECTION (ISI) PROGRAM

Reference: NRC letter to TVA dated February 7, 1991, "First 10-Year Interval Inservice Inspection Program (TAC 59457) - Sequoyah Nuclear Plant, Unit 1"

By the referenced letter, NRC provided the SER for SQN's Unit 1 10-Year ISI. TVA has completed its review of the subject SER and has identified one area of concern. The concern pertains to TVA's request for relief (RFR) ISI-4 and involves the lower-cone transition circumferential shell weld on the steam generator (SG) secondary side.

NRC evaluation of TVA's RFR was included in the technical evaluation report (TER) attached to the referenced SER (pages 32 and 33). This evaluation acknowledges that the lower-cone transition weld is partially inaccessible because of a permanent support ring and pads on each SG. American Society of Mechanical Engineers (ASME), Section XI, requires that 100 percent of one of these welds from one SG be examined each inspection interval. As a result of the ASME, Section XI, code requirement and the weld being partially inaccessible, the TER "concluded that relief from the Code requirements of a volumetric examination of the above mentioned steam generator circumferential shell welds should be granted, provided that the welds from other steam generators be volumetrically examined to the extent that the total examination on the steam generator welds equals 100% of one weld required to be examined."

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TVA requests that the original proposed alternative examination of RFR ISI-4 as submitted by TVA be granted without the additional examinations as concluded in the TER. TVA considers this approach to be justified based on the following:

- There is a small probability of weld failure based on history.
- Approximately 68 percent of the weld is volumetrically examined.
- The weld volume examined is spaced around the SG circumference and is well distributed. TVA considers this weld volume to be adequate for detection of problems such as cracking.

Please note that the withdrawal of this requirement for the additional examination will allow consistency with the Unit 2 ISI program previously approved by NRC. This request has been discussed with NRC technical staff.

It is requested that NRC's response be provided by July 31, 1991, to support the scheduling of outage activities for the Unit 1 Cycle 5 refueling outage. This outage is currently scheduled to begin October 4, 1991.

Please direct questions concerning this issue to D. V. Goodin at (615) 843-7734.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

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cc: See page 3

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