

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

July 30, 1984

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of) Docket Nos. 50-327
Tennessee Valley Authority) 50-328

In accordance with 10 CFR Part 50, enclosed is a request for relief, and a justification for the relief, from the hydrostatic test requirements specified in the 1977 Edition, Summer 1978 Addenda of Section XI of the ASME Code. The relief request is being submitted as a result of TVA's plan to replace feedwater drain valves, 3-512, 3-513, 3-516, 3-517, 3-520, 3-521, 3-524, and 3-525. An expeditious review of this request is needed to support the forthcoming unit 2, cycle 2 refueling outage scheduled to begin September 8, 1984.

If you have any questions concerning this matter, please get in touch with Jerry Wills at FTS 858-2683.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills

L. M. Mills, Manager
Nuclear Licensing

Sworn to and subscribed before me
this 30th day of July 1984

Paulette L. White

Notary Public

My Commission Expires 9-5-84

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)

Region II

Attn: Mr. James P. O'Reilly Administrator

101 Marietta Street, NW, Suite 2900

Atlanta, Georgia 30323

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ENCLOSURE

COMPONENTS

Sequoyah Nuclear Plant units 1 and 2 feedwater system. Installation of 2-inch bypass lines around 16-inch feedwater check valves 3-508, 3-509, 3-510, and 3-511 (drawings attached) in accordance with TVA ECN L5024.

Replacement of 1-1/2-inch feedwater drain valves 3-512, 3-513, 3-516, 3-517, 3-520, 3-521, 3-524, and 3-525 (drawings attached). These valves are to be installed by 1-1/2-inch socket welds.

CLASS

TVA safety Class B, ANSI B31.7; ASME Class 2 equivalent.

INSPECTION REQUIREMENTS

The code of record for repairs and replacements at Sequoyah is the 1980 Edition, Winter 1981 Addenda of ASME Section XI. This requires a hydrostatic pressure test of the replaced components. The pressure test program is to the 1977 Edition, Summer 1978 Addenda and requires the hydrostatic pressure test be performed at 1.25 times the system pressure P_{sv} .

BASIS FOR RELIEF

To accomplish the hydrostatic pressure test would require flooding the secondary side of each steam generator along with the 32-inch main steam lines to the outboard isolation valves. The main steam safety and power-operated relief valves would also require gagging to perform the test. The number of secondary side hydrostatic pressure tests allowed by the plant technical specifications (Section 5.7, Table 5.7.1) is 5. This does not allow for hydrostatic pressure tests other than the normally scheduled ones. It is our opinion that a significant increase in safety would not result from the hydrostatic pressure test over proposed alternate inspection below.

ALTERNATE INSPECTION

In addition to the construction code (B31.7, 1969 Edition, Summer 1970 Addenda) surface examination of the welds, an in-service leak check of the subject welds will be performed at operating pressure during startup from the outage in which the replacement is made. The regularly scheduled system hydrostatic pressure test should be performed in 1989-1990 for unit 1 and 1990-1991 for unit 2.