



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

April 24, 1996

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

Gentlemen:

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

SEQUOYAH NUCLEAR PLANT (SQN) - ADDITIONAL INFORMATION FOR AMERICAN
SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI RELIEF REQUEST -
SNUBBERS

- References:
1. TVA letter to NRC dated October 26, 1995, "Sequoyah Nuclear Plant (SQN) - American Society of Mechanical Engineers (ASME) Section XI Relief Request - Snubbers"
 2. TVA letter to NRC Dated March 6, 1996, "Sequoyah Nuclear Plant (SQN) - Additional Information for American Society of Mechanical Engineers (ASME) Section XI Relief Request - Snubbers"
 3. NRC letter to TVA dated March 25, 1982, "Issuance of Amendment No. 12 to Facility Operating License No. DPR-77 - Sequoyah Nuclear Plant, Unit 1"

TVA, by the Reference 1 letter, submitted a request for relief to exempt applicable snubbers from the ASME Section XI code requirements and, as an alternative, perform examinations and tests in accordance with SQN's technical specifications (TS).

In response to an NRC request, TVA is withdrawing a portion of its original request for relief associated with the requirements of ASME Section XI, Subarticle IWF-5200 entitled, "Preservice Examinations and Tests." TVA concurs with NRC that relief from IWF-5200 would not be necessary because IWF-5200 applies to preservice examination of nuclear plants under construction.

In addition, NRC requested additional information concerning why SQN's TS for snubbers contains an allowance for two functional test failures within a test lot before

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U.S. Nuclear Regulatory Commission
Page 2
April 24, 1996

testing additional lots, while the ASME code requires testing additional lots as a result of a single test failure. In response to this request, TVA provides the following:

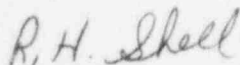
Surveillance requirements (SRs) for snubbers were incorporated into the SQN Unit 1 TSs under Amendment 12 (see Reference 3). Similar changes were approved for SQN's Unit 2 TSs. These SRs resulted from an April 17, 1981, meeting between TVA and NRC staff members H. Shaw and M. Virgilio. Agreements reached in the meeting resulted in TVA's amendment request to NRC dated August 28, 1981.

SQN's total population of safety-related snubbers is divided into five subgroups on each unit. Four subgroups are based on design and snubber type while the fifth subgroup is based on environment. For four out of the five subgroups, SQN's functional test program limits the snubber failure rate to one snubber within a subgroup before testing additional lots. This approach is consistent with ASME code and is more conservative than the failure rate allowed by SQN TSs (i.e., two failures per TS SR 4.7.9.f). For one of SQN's five subgroups (i.e., midsize mechanical snubbers subgroup on Unit 1), SQN's Snubber Test Program incorporates the TS by allowing the failure rate to increase to two. This allowance is based on the larger population of snubbers (235) within this subgroup. TVA has evaluated applying the conservative ASME code failure rate to this subgroup and concludes that this approach does not result in a significant impact to SQN's functional test activities. Accordingly, TVA will revise SQN's Snubber Test Program (Surveillance Instruction O-SI-MFT-000-001.0) to limit the failure rate within this subgroup to one (refer to enclosure for the TVA commitment). This approach will apply the same failure rate limit to all subgroups and will provide consistency with the ASME code requirements.

In conclusion, TVA proposes to: (1) withdraw IWF-5200 from SQN's original relief request letter (Reference 1), and (2) with the exception of TS SR 4.7.9.f, request exemption for applicable snubbers from the 1989 Edition of the ASME Section XI Code, and as an alternative, perform examination and testing in accordance with SQN TS SR 3/4.7.9, "Snubbers." With regard to TS SR 4.7.9.f, TVA will limit SQN's snubber test failure rate to one failure.

Please direct questions concerning this issue to D. V. Goodin at (423) 843-7734.

Sincerely,



R. H. Shell
Manager
SQN Site Licensing

Enclosure
cc: See page 3

U.S. Nuclear Regulatory Commission
Page 3
April 24, 1996

cc (Enclosure):

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Enclosure

TVA Commitment

TVA will revise SQN's Snubber Test Program (Surveillance Instruction O-SI-MFT-000-001.0) to limit the allowed failure rate to one. This revision will be complete by June 21, 1996.