

official copy

DEC 24 1992

Docket Nos. 50-327 and 50-328
License Nos. DPR-77, DPR-79

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford, Vice President
Nuclear Assurance, Licensing & Fuels
3B Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Dr. Medford:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE - SEQUOYAH UNITS 1 AND 2

This letter confirms the telephone conversation between Mr. R. A. Fenech, Vice President, Sequoyah Nuclear Plant, and Mr. E. W. Merschoff of my staff on December 23, 1992, granting a Regional Waiver of Compliance for Sequoyah Units 1 and 2. Our action was based on your written request letter dated December 23, 1992 (copy enclosed).

Technical Specifications (TS) 4.0.3, "Surveillance Requirements" requires in part that the failure to perform a Surveillance Requirement within the allowed surveillance interval shall constitute noncompliance with the OPERABILITY requirement for a Limiting Condition for Operation. The ACTION requirements may be delayed for up to 24 hours to permit completion of the surveillance. TS 3.7.4, "Essential Raw Cooling Water System" requires in part at least two independent essential raw cooling water (ERCW) loops shall be operable. On December 22, 1992, TVA identified that the ERCW system had not received the total scope pressure tests required by the ASME, Section XI, Table IWD-2500-1. TVA immediately started to perform the required testing was unable to complete it in the required 24 hours.

Thus TVA requested a Temporary Waiver of Compliance of TS 4.0.3 for an additional period of time not to exceed 24 hours from 11:30 a.m. on December 23, 1992 and a Temporary Waiver of Compliance of TS 3.7.4 for an additional period of time not to exceed 96 hours from 11:30 a.m. on December 25, 1992.

The purpose of this Waiver Request is to allow sufficient time to complete the total scope of pressure tests of the ERCW system and thereby satisfy the Surveillance Requirement without unnecessarily requiring the shutdown of both units. Inspections conducted in the last 24 hours have identified no new problems.

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This Waiver request was reviewed by the Plant Operations Review Committee (PORC) and was approved by the Vice President Sequoyah Nuclear Plant.

This request was discussed with the TVA and NRC staff by telephone on December 22 and 23, 1992. The NRC staff on December 22, consisted of E. W. Merschoff, F. J. Hebdon, G. C. Lainas, B. Wilson and J. Blake. Concurring on the decision were H. Berkow and F. Hebdon, NRR, C. Julian, B. Wilson and E. Merschoff, Region II.

Should you have any questions concerning this letter, please contact us.

Sincerely,

(Original signed by L. Reyes)

Luis A. Reyes
Deputy Regional Administrator

Enclosure:
Temporary Waiver of Compliance
Request dated December 23, 1992

cc w/encl: (See page 3)

DEC 24 1992

bcc w/encl:

S. D. Ebnetter, RII

L. A. Reyes, RII

J. R. Johnson, RII

G. C. Lainas, NRR

F. J. Hebdon, NRR

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M. S. Callahan, GRP/CA

P. J. Kellogg, RII

J. L. Mathis, RII

D. E. Labarge, NRR

NRC Document Control Desk

NRC Senior Resident Inspector

U.S. Nuclear Regulatory Commission

2600 Igou Ferry

Soddy-Daisy, TN 37379

DRP/RII

BAW

BWilson

12/23/92

DRP/RII

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EMerschoff

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12/24/92

Tennessee Valley Authority

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cc w/encl:

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Mr. M. J. Burzynski, Manager
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Mr. Michael H. Mobley, Director
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County Judge
Hamilton County Courthouse
Chattanooga, TN 37402

bcc w/encl: (See page 4)



ENCLOSURE

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

Robert A. Fenech
Vice President, Sequoyah Nuclear Plant

December 23, 1992

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

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket Nos. 50-327
50-328

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - REQUEST FOR WAIVER OF
COMPLIANCE FOR TECHNICAL SPECIFICATION (TS) SURVEILLANCE REQUIREMENT
(SR) 4.0.3 AND TS LIMITING CONDITION FOR OPERATION (LCO) 3.7.4

This letter serves to document TVA's request for a waiver of compliance for Units 1 and 2 TS SR 4.0.3 and TS LCO 3.7.4 to support completion of inservice pressure testing of the essential raw cooling water (ERCW) system. This waiver was needed as a result of the failure to perform the total scope of pressure tests required by the American Society of Mechanical Engineers (ASME), Section XI, Table IWD-2500-1, on the ERCW system.

TVA is requesting a waiver for an additional period of 24 hours from TS SR 4.0.3 and 96 hours to TS LCO 3.7.4 to allow completion of inservice system pressure tests on the ERCW system. This additional time is needed to prevent shutdown of both units in accordance with TS 3.0.3 and TS 3.7.4. This condition arose as a result of the discovery that not all the required inservice system pressure tests had been performed during the second inspection period of the first 10-year interval in accordance with ASME, Section XI, as required by TS SR 4.0.5. The purpose of an inservice system pressure test is to look for system leakage that is performed by a qualified inspector. Thus, while the ERCW system is considered functional, compliance with TS SR 4.0.5 has not been maintained. As both trains of ERCW are affected, TS 3.0.3 is applicable; however, TS SR 4.0.3 allows delay of up to 24 hours to permit the completion of the surveillance (i.e., pressure tests). Efforts are focusing on the completion of inspection of the B-train of the ERCW system. As the completion of the B-train inspections will not be completed within the timeframes allowed by TS SR 4.0.3, an additional 24 hours was requested.

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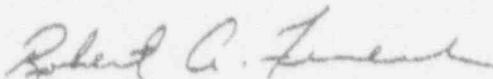
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Upon completion of these B-train inspections, the remaining inspections must be completed. As a result of the volume of work required and the timing for resolution of this issue, an additional 96 hours was also requested for both unit's TS LCO 3.7.4. Thus, with this waiver, the B-train ERCW inspections for both units must be completed by 11:30 a.m. Eastern standard time (EST) on December 24, 1992, and the A-train ERCW inspections for both units must be completed by 11:30 a.m. EST on December 29, 1992. This request has been reviewed and approved by the Plant Operations Review Committee. The detailed justification for the waiver of compliance is provided in the enclosure.

NRC approval of the 24-hour waiver of compliance to TS SR 4.0.3 and 96-hour waiver to TS LCO 3.7.4 was granted verbally by Luis Reyes, Action Regional Administrator, to TVA at 11:00 a.m. EST on December 23, 1992.

If you have any questions concerning this issue, please call J. D. Smith at (615) 843-6672.

Sincerely,



Robert A. Fenech

Enclosure

cc (Enclosure):

Mr. D. E. LaBarge, Project Manager
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Mr. Michael H. Mobley, Director (w/o Enclosures)
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NRC Resident Inspector
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Mr. B. A. Wilson, Project Chief
U.S. Nuclear Regulatory Commission
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101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323-0199

U.S. Nuclear Regulatory Commission

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MAC:JDS:PMB

Enclosure

cc (Enclosure):

M. J. Burzynski, LP 5B-C
J. R. Bynum, LP 3B-C
E. S. Christenbury, ET 11H-K
W. R. Cobean, Jr., LP 3B-C
M. A. Cooper, OPS 4C-SQN
L. M. Cuoco, LP 5B-C
R. W. Huston, Rockville Licensing Office
E. T. Landrey, MR 2C-C
T. J. McGrath, LP 3B-C
M. O. Medford, LP 3B-C
D. E. Nunn, Jr., LP 3B-C
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RIMS, MR 2F-C

PL316201/785

ENCLOSURE

Background

American Society of Mechanical Engineers (ASME), Section XI, Table IWD-2500-1, requires a visual inspection (VT-2) as a part of an inservice pressure test of safety-related components within each of the three inspection periods during each 10-year inservice inspection interval. The 10-year inspection interval ends September 15, 1994, and February 21, 1995, for Units 1 and 2, respectively. The second period for each unit's first 10-year interval ended September 15, 1991, and February 21, 1992, for Units 1 and 2, respectively. During a review of the Section XI program on December 22, 1992, to prepare for closure of the first 10-year interval, it was determined that pressure tests on various systems (e.g., auxiliary feedwater, containment spray, essential raw cooling water [ERCW], and spent fuel pit) had not been performed during the second period.

Technical Specification (TS) 4.0.5 requires, among other things, that surveillance requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components be performed as required by 10 CFR 50.55a(g). Upon identification of the above nonconformance, the appropriate limiting conditions for operation (LCOs) were entered. As both trains of containment spray for both units and both trains of the ERCW on Unit 2 were affected, TS 3.0.3 was entered. As allowed by TS Surveillance Requirement (SR) 4.0.3, the action requirements were delayed for up to 24 hours to permit the completion of the surveillance since the allowable outage time limits of the action requirements are less than 24 hours. TVA immediately initiated efforts to perform the inservice system pressure tests to restore at least one train of each dual-train affected system to operable status. The scope of the work required to be completed within 24 hours consisted of one train (B-train) of containment spray for each unit and one train of the ERCW (B-train) for both units. The volume of work required for one train of the ERCW could not be completed within 24 hours. In addition, the volume of work required for completion of the A-train ERCW inspections for both units cannot be completed within the TS LCO required by TS 3.7.4. Thus, because of this volume of work and the timing for the resolution of this issue, an additional 96 hours was requested for completion of the A-train inspections for both units.

Safety Significance

The ASME inservice pressure test consists of a walkdown to perform a VT-2 of a system to determine if there are any leaks in the system at normal operating pressure. The failure to perform the pressure test does not affect the function of the system or the adjacent areas. There are various other methods of detecting leaks. These methods include various flow indicators, pressure indicators, radiation monitors, and other testing that would show the existence of a substantial leak. Areas within the ERCW system that are known to be susceptible to leakage mechanisms (i.e., erosion/corrosion and microbiologically induced corrosion) are maintained in plant programs using volumetric nondestructive examination and visual techniques. Additionally, there are frequent walkdowns performed by personnel in the plant from Operations, Technical Support, and Radiological Control who would investigate the source of any leakage found.