

# TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 9, 1985

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  
Tennessee Valley Authority

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Docket Nos. 50-327  
50-328

By the December 23, 1982 letter from T. M. Novak to H. G. Parris, NRC granted relief from the ASME Code requirements requiring a hydrostatic test on various portions of the Essential Raw Cooling Water (ERCW) System following replacement, modification, or repair of piping. As part of the proposed alternative inspection, we indicated that a system hydrostatic leakage test would be performed by the end of the unit 1 cycle 3 refueling outage, which was previously scheduled for January 1986. As stated in the Safety Evaluation Report (SER) for each request, NRC granted relief because the hydrostatic test required by the ASME Code was impractical considering the proposed alternative test and weld examinations versus the gain in safety if the ASME Code tests were required to be performed.

At the time the requests were made, we had intended to replace major sections of the ERCW piping as part of the program to improve the ERCW system and to reduce the possibility of flow reducing corrosion buildup. Since the piping replacements, repair, or modification made to date, with the exception of the changes to the Auxiliary Essential Raw Cooling Water System (AERCW), have been tested in accordance with the ASME Code requirements and since the AERCW system has been deleted from use at Sequoyah subsequent to the installation of the permanent ERCW pumping station, we do not intend to perform the system hydrostatic test indicated in the October 13, November 18, and December 23, 1982 letters from L. M. Mills since the relief requests have not been utilized.

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Also, by the December 10, 1984 letter from T. M. Novak to H. G. Parris, NRC approved the relief from performing the hydrostatic test on the ERCW for the additional piping for the proposed fifth diesel generator. This relief request will not be utilized and we request it be withdrawn. Therefore, we do not intend to perform the system hydrostatic test as previously indicated in the September 21, 1984 request from TVA.

For both of these areas, if future modifications are necessary which warrant relief from the ASME Code requirements, we will resubmit additional relief requests. If you have any questions, please call Jerry Wills at FTS 858-2683.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*J. A. Domer*

J. A. Domer, Chief  
Nuclear Licensing Branch

Sworn to and subscribed before me  
this 9th day of Sept, 1985

*Bryant M. Lowery*  
Notary Public

My Commission Expires 4/8/86

cc: U.S. Nuclear Regulatory Commission  
Region II  
Attn: Dr. J. Nelson Grace, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Mr. Carl Stahle  
Sequoyah Project Manager  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Maryland 20814