TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

JAN 21 1988

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) - RELIEF REQUEST REQUIRED FOR SIX SOLENOID-ACTUATED HYDROGEN ANALYZER SAMPLING VALVES FOR SQN'S IN-SERVICE TEST (IST) PROGRAM

In response to a recent design change to SQN's unit 2 Hydrogen Analyzer Sampling System, SQN is replacing four existing air-operated inboard containment isolation valves (FCV-43-201, -202, -207, and -208) with solenoid-actuated valves having a totally enclosed valve design. These valves are presently tested under SQN's IST Program; however, because of the change in valve design, valve position cannot be visually observed as required by IWV-3300 of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI. In lieu of the visual observation requirement, SQN requests relief to perform an alternate pressure test to verify proper valve operation.

In addition, four other solenoid-actuated hydrogen analyzer sampling valves (FSV-43-200A, -200I, -210A, and -210I) will be added to SQN's IST Program. These valves are located on the existing hydrogen analyzer calibration and reagent air lines and will be designated as outboard containment isolation valves. The 200A and 210A valves (located on the reagent lines) are classified as active valves and are required to be tested under the Section XI code. The 200I and 210I valves (located on the calibration lines) are classified as passive valves and are not required to be tested under Section XI. Because the 200A and 210A solenoid valves are active valves and similar in design to the inboard containment isolation valves, relief is requested to perform an alternate pressure test similar to the inboard containment isolation valves.

The enclosure contains: (1) a revised Appendix C to SQN's valve program (reference SQN's Final Safety Analysis Report, section 6.8) to reflect the additions and changes to the test program; and (2) the associated additions to relief request PV-15 which is an existing NRC approved relief request.

Because this program change contains a request for relief from the ASME Boiler and Pressure Vessel Code, Section XI, this item constitutes a startup

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requirement. TVA requests that this submittal be expediently reviewed and a Safety Evaluation Report (SER) be issued to address this change. If an SER cannot be completed to support plant restart, a written response documenting NRC review and concurrence with SQN's valve program would be beneficial. Upon receipt of either an SER or NRC concurrence, SQN will change its valve program to be consistent with NRC's approved position.

If you have any questions concerning this issue, please telephone M. R. Harding at (615) 870-6422.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley, Director
Nuclear Licensing and
Regulatory Affairs

Enclosures
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ENCLOSURE

Revised Appendix C to Sequoyah Nuclear Plant's (SQN)
In-Service Valve Test Program
(SQN Final Safety Analysis Report, section 6.8)

This is a new page to SQN's FSAR that will be designated 6.8C-18A.

Sequoyah Nuclear Plant Inservice Valve Testing Program

SYSTEM: (43) SAMPLING

DRAWING NO: 47W625-20(R4)

VALVE NUMBER	ASME CLASS	DRAWING COORDINATES	VALVE CATEGORY	SIZE	VALVE TYPE	ACTUATOR TYPE	NORMAL POSITION	TESTING REQUIRED	RELIEF REQUEST	ALTERNATIVE TESTING	REMARKS
FSV-43-200A	2		A-ACT	3/8	GA	SO	C	QT-1, SLT	X	YES	PV-15
FSV-43-200I	2		A-PAS	3/8	GA	SO	C	SLT			
FSV-43-210A	2		A-ACT	3/8	GA	SO	C	QT-1, SLT	X	YES	PV-15
FSV-43-210I	2		A-PAS	3/8	GA	SO	C	SLT			

Sequoyah Nuclear Plant Inservice Valve Testing Program

SYSTEM: (43) SAMPLING

DRAWING NO: 47W625-11 (R9)

VALVE NUMBER	ASME CLASS	DRAWING COORDINATES	VALVE CATEGORY	SIZE	VALVE TYPE	ACTUATOR TYPE	NORMAL POSITION	TESTING REQUIRED	RELIEF REQUEST	ALTERNATIVE TESTING	REMARKS
FCV-43-201	2	F-8	A-ACT	3/8	GA	~~DIA~~ SO	ØC	QT-1, SLT	X	YES	PV-15
FCV-43-202	2	C-9	A-ACT	3/8	GA	~~DIA~~ SO	ØC	QT-1, SLT	X	YES	PV-15
FCV-43-207	2	C-10	A-ACT	3/8	GA	~~DIA~~ SO	ØC	QT-1, SLT	X	YES	PV-15
FCV-43-208	2	B-11	A-ACT	3/8	GA	~~DIA~~ SO	ØC	QT-1, SLT	X	YES	PV-15

Revised by Amendment 4

PV-15

System:	~~Postaccident~~ Sampling
Valve:	FSV-43-250, FSV-43-251, FSV-43-287, FSV-43-288, FSV-43-307, FSV-43-309, FSV-43-310, FSV-43-317, FSV-43-318, FSV-43-319, FSV-43-325, FSV-43-341 FSV-43-201, FSV-43-202, FSV-43-207, FSV-43-205 FSV-43-200A, FSV-43-210A
Class:	2
Category:	A - Active
Function:	To permit reactor coolant system and containment atmosphere sampling in a postaccident condition.
Impractical Requirement:	Observe valve movement every two years to verify remote valve indicators accurately reflect valve operation.
Basis for Relief:	These solenoid actuated valves are totally enclosed, and valve position cannot be determined visually.
Alternate Testing:	Pressure indicators will be used to independently verify valve operation.
Frequency for Alt Testing:	Every 2 years.

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Added by Amendment 3

ENCLOSURE 2

LIST OF COMMITMENTS

1. All 6 solenoid-actuated hydrogen analyzer sampling valves will be tested in accordance with the provisions prescribed in enclosure 1 before entering mode 2 for both units.

cynthia - pls fix ASAP.
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