



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 2, 2022

LICENSEE: Tennessee Valley Authority

FACILITY: Sequoyah Nuclear Plant, Units 1 and 2

SUBJECT: SUMMARY OF FEBRUARY 16, 2022, PUBLIC PREAPPLICATION MEETING WITH TENNESSEE VALLEY AUTHORITY REGARDING A FUTURE SUBMITTAL OF A REQUEST FOR AN ALTERNATIVE TO REQUIREMENTS FOR ADDRESSING PRESSURE ISOLATION VALVE LEAKAGE (EPID L-2022-LRM-0110)

On February 16, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff held a virtual public meeting with representatives from Tennessee Valley Authority (TVA). The purpose of the meeting was to discuss the licensee's plans to submit a request for an alternative for the Sequoyah Nuclear Plant, Units 1 and 2 (Sequoyah), to the requirements of American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, Subsection ISTC-3630, related to Pressure Isolation Valve (PIV) leakage. The meeting notice and agenda, dated February 4, 2022, are available in the NRC's Agencywide Documents Access and Management System (ADAMS) under Accession No. ML22035A090. A list of attendees is provided in the enclosure.

During the meeting, the licensee presented information (ADAMS Accession No. ML22046A293) regarding the future request which included information about the types of PIVs the future request would be applicable to, past experience with addressing PIV leakage, the specifics of the future alternative request and the expected request's need date.

In response to the TVA presentation, the NRC staff discussed with TVA the following observations and elements that would help ensure a comprehensive submittal and efficient NRC staff review:

- The OM code provides a formula to determine what a leak rate would be at a higher pressure if a leak rate test is performed at a lower pressure.
- Lower test pressure often cannot seat valves.
- Since there seems to be no change needed to the Technical Specifications (TS) or Surveillance Requirement (SR) related to this alternative request, a TS Task Force (TSTF) type of remedy would not be appropriate.
- A discussion of whether this request impacts the associated TS or SR, or any interpretation of whether the SR is met, would allow staff to determine if TVA is essentially asking for a relaxation only in OM Code space.
- The issue regarding the definition of TS 'operability' versus OM code 'operability' has been addressed to the OM code committee, but any resultant code committee action would not support the need date TVA is requesting for this alternative request.
- Recent events at Prairie Island Nuclear Generating Plant and Turkey Point Nuclear Generating Station have heightened TVA's awareness of this issue in addition to recent

similar experience during the last Sequoyah Unit 1 outage. This is driving the need for this alternative being ready for the Sequoyah Unit 1 fall 2022 outage.

- Mechanical PIV valve agitation to better seat the PIV is not permitted under the OM code.
- Failed PIVs are tested for leakage flow rate to assess performance.
- Information on how PIVs are tested each outage would be helpful.
- Including a high-level discussion of the maintenance history for the PIVs to which the alternative request applies would be helpful.
- Include a description of how TVA performs condition monitoring of the valves during operation.
- Provide a description of typical mechanical agitation methods for various sizes of valves (2 inch through 10 inch) that may be used if a PIV fails its leak rate test.
- Provide a statement that TVA evaluated the design of each check valve to demonstrate that if a valve initially fails leak testing and the alternative is applied there is no potential of disc separation/failure that would impede flow if the valve has to open during an accident.

The NRC staff did not make any regulatory decisions or commitments at the meeting. There were no members of the public in attendance.

Please direct any inquiries to me at 301-415-1383 or by e-mail to Perry.Buckberg@nrc.gov.

/RA/

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Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-327, 50-328

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES
FEBRUARY 16, 2022, VIRTUAL PUBLIC MEETING
WITH TENNESSEE VALLEY AUTHORITY, ET AL.
SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2
PRE-APPLICATION MEETING REGARDING
ALTERNATIVE TO REQUIREMENTS FOR ADDRESSING
PRESSURE ISOLATION VALVE LEAKAGE

U.S. Nuclear Regulatory Commission

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Tennessee Valley Authority

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Stuart Rymer
Mark Gowin
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² Division of Operating Reactor Licensing

³ Plant Licensing Branch II-2

⁴ Division Engineering and External Hazards

⁵ Mechanical Engineering & Inservice Testing Branch

⁶ Division of Safety Systems

⁷ Technical Specifications Branch

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FOR ADDRESSING PRESSURE ISOLATION VALVE LEAKAGE
(EPID L-2022-LRM-0110) DATED MARCH 2, 2022

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ADAMS Accession Nos.:

ML22046A295 (Package)

ML22048B785 (Summary)

ML22046A293 (Presentation)

ML22035A090 (Meeting Notice)

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