



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

December 27, 2001

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of) Docket No. 50-260
Tennessee Valley Authority)

BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 2 - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION AND SYSTEM PRESSURE TEST PROGRAMS FOR THE THIRD TEN-YEAR INSPECTION INTERVAL - REVISION TO SYSTEM PRESSURE TEST REQUEST FOR RELIEF 2-SPT-10 (TAC NO. MB0400)

TVA submitted, by letter dated February 5, 2001, its Third Ten-Year Inservice Inspection (ISI) and System Pressure Test (SPT) Programs for Unit 2 of the Browns Ferry Nuclear Plant. The Code of record for the Third Ten-Year Interval ISI and SPT Programs is the 1995 Edition, 1996 Addenda of the ASME Boiler and Pressure Vessel Code, Section XI. The Third Ten-Year Interval began on May 25, 2001.

During its review of the BFN Unit 2 Third Interval Programs, the NRC staff identified questions regarding System Pressure Test request for relief 2-SPT-10. Request for relief 2-SPT-10 incorporates the requirements of ASME Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel," plus additional criteria added by TVA regarding procedural guidelines, inspector qualification record maintenance, and examination record reviews. TVA and the NRC staff held a teleconference on October 30, 2001, to discuss the NRC questions. During that teleconference the NRC staff requested that TVA revise request for relief 2-SPT-10 to

A047

U.S. Nuclear Regulatory Commission

Page 2

December 27, 2001

include additional criteria. The additional criteria include the following:

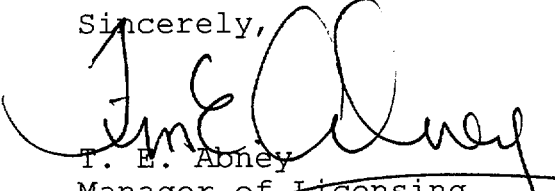
- Qualification of VT-2 examination personnel by examination on the material covered under item (b) of the requirements of Code Case N-546, and
- Recertification of VT-2 examination personnel by examination every three years.

The NRC staff has proposed to add the above criteria to ASME Code Case N-546 requirements (Incorporated in ASME Section XI, 1998 Edition, Subarticle IWA-2316) in a revision to 10 CFR 50.55a (Volume 66 *Federal Register* No. 150, Pages 40626-40640) that would incorporate the Code Case by reference. As part of the rule making process, TVA and the Nuclear Energy Institute (NEI) have provided comments (TVA letter dated October 15, 2001 and NEI letter dated October 17, 2001) opposed to the VT-2 recertification criteria. TVA considers the additional requirement for recertification of Code Case N-546 qualified personnel every three years to be unnecessary and that it places an unjustified burden on the utility without a compensating increase in the level of quality and safety.

However, pending the outcome of the rule making process, TVA agrees to revise request for relief 2-SPT-10 to include the above additional criteria as described in the proposed rule change. Should the rule-making process eliminate the additional criteria, TVA will use ASME Code Case N-546 without the additional requirement for recertification of VT-2 examination personnel.

The enclosure to this letter provides a summary of TVA's commitment. If you have any questions, please contact me at (256) 729-2636.

Sincerely,



T. E. Abney
Manager of Licensing
and Industry Affairs

cc: See Page 3

U.S. Nuclear Regulatory Commission
Page 3
December 27, 2001

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ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2

AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI,
INSERVICE INSPECTION (ISI) AND SYSTEM PRESSURE TEST (SPT)
PROGRAMS, THIRD TEN-YEAR INSPECTION INTERVAL

COMMITMENT SUMMARY

TVA will revise BFN Unit 2 request for relief 2-SPT-10 to add the following additional criteria to ASME Code Case N-546.

- Qualification of VT-2 examination personnel by examination on the material covered under item (b) of the requirements of Code Case N-546, and
- Recertification of VT-2 examination personnel by examination every three years.