



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

September 26, 2003

10 CFR 50.55a(g)(4)(iv)

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop: OWFN P1-35  
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of	)	Docket No. 50-259
Tennessee Valley Authority	)	50-260
		50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION (ISI) PROGRAM - REQUEST TO USE SUBSEQUENT EDITION AND ADDENDA OF ASME SECTION XI FOR QUALIFICATION OF ALTERNATIVE VT-2 EXAMINATION PERSONNEL**

Subject to NRC approval, 10 CFR 50.55a(g)(4)(iv) permits the use of portions of subsequent editions and addenda of ASME Section XI Code which have been incorporated by reference in paragraph (b) of that section, for inservice examination of components and system pressure tests. In accordance with the provisions of 10 CFR 50.55a(g)(4)(iv), TVA is adopting the requirements for alternative qualification of VT-2 (visual) examination personnel specified in the 1998 Edition of the ASME Section XI Code, subarticle IWA-2316, for observation of leakage during system leakage and hydrostatic tests for BFN Units 1, 2, and 3.

IWA-2316 is a described alternative to the other requirements in the Section XI articles, therefore, the embedded vision test requirements (IWA-2321, IWA-2322 and Table IWA-2322-1) are the only related requirements from the 1998 Edition which are associated with IWA-2316 and are being adopted for use in the qualification of the alternate VT-2 examiners.

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TVA qualifies alternate VT-2 examination personnel through the task qualification process, which meets and documents the requirements of subarticle IWA-2316 and includes a written examination. Annual visual acuity examinations are tracked by TVA and are required to maintain examiner qualification. Training and qualification records are maintained as plant records.

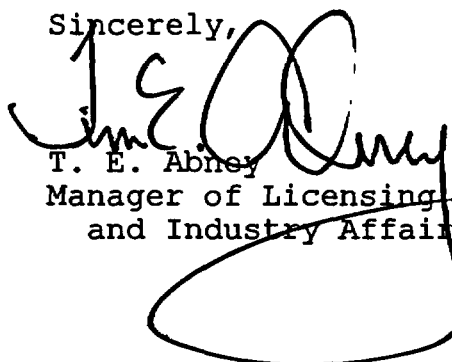
The alternative VT-2 qualified personnel will be used for performance of VT-2 (visual) examinations and not for other administrative functions performed by certified examination personnel. TVA intends to limit VT-2 examinations by alternate VT-2 qualified examiners to system leakage tests or hydrostatic tests on fluid systems for Section XI Code required examinations. Alternate VT-2 examiners will not perform gas leakage or bubble tests for Section XI Code credit.

This request applies to the end of the current inservice inspection interval for each unit. BFN Unit 1 is in the first inservice inspection interval, which ends one year following restart of the unit. Unit 2 is in the third inservice inspection interval, which concludes on May 24, 2011. BFN Unit 3 is in the second inservice inspection interval, which ends November 18, 2005.

TVA requests approval of this request by December 5, 2003, to support future BFN refueling outages.

There are no new regulatory commitments in this letter. If you have any questions, please contact me at (256) 729-2636.

Sincerely,



T. E. Abney  
Manager of Licensing  
and Industry Affairs