

December 20, 2005

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. 50-260
Tennessee Valley Authority)	

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 2 - AMERICAN SOCIETY
OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION
(ISI) PROGRAM - REQUEST TO USE SUBSEQUENT EDITION AND ADDENDA
OF ASME SECTION XI CODE FOR REPAIR AND REPLACEMENT ACTIVITIES**

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 Codes, which have been incorporated by reference in paragraph (b) of that section, for inservice examination of components and system pressure tests. Also, subarticle IWA-4150(b) of the ASME Section XI Code allows use of later editions and addenda when the later editions and addenda have been accepted by the enforcement and regulatory authorities having jurisdiction at the plant site. In accordance with the provisions of 10 CFR 50.55a(g)(4)(iv), and ASME Section XI IWA-4150(b), TVA seeks to adopt the requirements for Repair and Replacement Activities specified in the 2001 Edition, 2003 Addenda of the ASME Section XI Code, Subarticle IWA-4000 and all related requirements, for BFN Unit 2.

The ASME Section XI Code of record for the BFN Unit 2 third ten-year inservice inspection interval is the 1995 Edition, 1996 addenda. BFN Unit 3 has adopted the 2001 Edition, 2003

U.S. Nuclear Regulatory Commission
Page 2
December 20, 2005

Addenda of ASME Section XI as the Code of record for the third ten-year inspection interval which began November 19, 2005. The Unit 3 third ten-year inspection interval program was submitted to NRC by TVA letter dated October 19, 2005. This requested change for Unit 2 will allow both operating units at BFN to use the same ASME requirements for Repair and Replacement activities.

BFN Unit 1 is currently shutdown. Unit 1 is using the 1995 Edition, 1996 Addenda and does not currently plan to adopt later editions for Repair and Replacement activities prior to Unit 1 restart.

This request applies to the current BFN Unit 2 ten-year inservice inspection interval. BFN Unit 2 is in the third ten-year inservice inspection interval, which concludes on May 24, 2011.

This request is consistent with the guidance provided in NRC Regulatory Issue Summaries 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," and 2004-16, "Use of Later Editions and Addenda to ASME Code Section XI for Repair/Replacement Activities." TVA seeks approval of this request by June 2006 to allow resource planning for the next Unit 2 refueling outage (Spring 2007).

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

Sincerely,

Original signed by:

William D. Crouch
Manager of Licensing
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cc: See Page 3

U.S. Nuclear Regulatory Commission
Page 3
December 20, 2005

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U.S. Nuclear Regulatory Commission
Page 4
December 20, 2005

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