

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

August 4, 2006

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 - RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION TAC NO. MC9287)

By letter dated December 20, 2005, TVA requested NRC approval, pursuant to 10 CFR 50.55a(g)(4)(iv), to adopt a later edition of the ASME Section XI for BFN Unit 2. Specifically, TVA proposed 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, as the code of record for the third ten-year inservice inspection interval for Unit 2.

Subsequent to TVA's submittal, the NRC staff informed TVA by letter dated June 28, 2006, that it was considering rulemaking that would require the nondestructive examination (NDE) provision in IWA-4540(a)(2) of the 2002 Addenda of Section XI to be applied when performing system leakage tests after repair and replacement activities performed by welding or brazing. This provision is not in the 2003 Addenda of ASME Section XI Code.

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Consequently, TVA is adding additional requirements to its request to adopt the 2001 Edition, 2003 Addenda of the ASME Section XI Code, Subarticle IWA-4000 and all related requirements, as the code of record for the third ten-year inservice inspection interval for repair/replacement activities for Unit 2. Subarticle IWA-4540(a) requires pressure testing (unless exempted by IWA-4540(b)) following repair and replacement activities performed by welding or brazing. IWA-4540(a) provides two options to satisfy the required pressure testing; a hydrostatic test, or a system leakage test. When BFN Unit 2 selects the option of performing the system leakage test to satisfy the IWA-4540(a) requirements, the additional requirements for the nondestructive examination method and acceptance criteria of the 1992 Edition or later of Section III shall be met prior to return to service of the component.

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

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

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