



1101 Market Street, Chattanooga, Tennessee 37402

CNL-18-034

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10 CFR 50.55a

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

Watts Bar Nuclear Plant, Unit 2  
Facility Operating License No. NPF-96  
NRC Docket Nos. 50-391

**Subject: Watts Bar Unit 2 Request to Use a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI, for Containment Inservice Inspection Activities**

- References:
1. NRC letter to TVA, "Watts Bar Nuclear Plant, Unit 2 - Relief from the Requirements of the ASME Code for the First 10-Year Interval of the Containment Inservice Inspection," dated August 8, 2015 (ML15215A484)
  2. NRC letter to Entergy Operations, Inc., "River Bend Station, Unit 1 - Relief to Use Later Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (EPID No. L-2017-LLR-0114)," dated November 2, 2017 (ML17303A086)
  3. NRC letter to PSEG Nuclear LLC, "Salem Nuclear Generating Station, Unit No. 1 - Use of a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI (EPID No. L-2017-LRO-0048)," dated November 1, 2017 (ML 17304A943)

Pursuant to 10 CFR 50.55a(g)(4)(iv) and in accordance with the guidance provided in Regulatory Issue Summary (RIS) 2004-12, "Clarification on the Use of Later Editions and Addenda to the ASME OM Code and Section XI," Tennessee Valley Authority (TVA) requests Nuclear Regulatory Commission (NRC) approval to use a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for the Containment Inservice Inspection (ISI) IWE program for the Watts Bar Nuclear Plant (WBN) Unit 2, for the remainder of the first (ISI) Interval. Specifically, TVA proposes to use the 2013 Edition of Section XI of the ASME B&PV Code for the IWE program, in its entirety, for WBN Unit 2, including all related requirements of ASME Section XI, subject to the applicable conditions in 10 CFR 50.55a(b)(2)(ix). This request is in lieu of the requirements of ASME Section XI 2007 Edition, 2008 Addenda (i.e., the current Code of Record for WBN Unit 2) for the inspection of the primary containment structure. The first Interval for WBN Unit 2 began on June 30, 2016, and is currently scheduled to end on June 29, 2026.

As noted in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," requests to use later editions and addenda of the ASME Code, Section XI, pursuant to 10 CFR 50.55a(g)(4)(iv) do not constitute either an alternative pursuant to 10 CFR 50.55a(z), or a relief request pursuant to 10 CFR 50.55a(g)(5)(iv).

During the WBN Unit 2 first refueling outage, VT-1 visual examinations were performed on disassembled containment bolted connections, per Category E-G, Item No. E8.10, with no recordable indications. The General Visual examinations of Category E-A containment surfaces and moisture barriers were not performed during the first refueling outage, but are scheduled to be completed during the WBN Unit 2 Cycle 2 refueling outage (U2R2) in Spring 2019. There are currently no Category E-C areas of containment identified as requiring augmented examination.

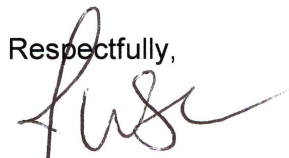
As discussed in RIS 2004-12, if portions of a later Code edition and addenda are used, licensees must assure that all related requirements of the respective editions and addenda are met. As discussed above, TVA will meet the requirements referenced in the 2013 Edition of Section XI of Article IWE-5000.

TVA requests approval of the proposed request by September 8, 2018, to support consolidation of the WBN Unit 1 and Unit 2 IWE procedures prior to the start of the third IWE interval for WBN Unit 1 (i.e., September 9, 2018) at which time WBN Unit 1 will also be utilizing the 2013 Edition of Section XI of the ASME B&PV Code for the IWE program. TVA plans to implement the 2013 Edition of Section XI of the ASME B&PV Code for the IWE program for WBN Unit 2 during the U2R2 refueling outage. The requested NRC approval date also supports planning for that outage.

This request is similar in nature to the following previous NRC-approved requests to use an alternative edition of Section XI of the ASME B&PV Code for: WBN Unit 2 (Reference 1), River Bend Station, Unit 1 (Reference 2), and Salem Nuclear Generating Station, Unit No. 1 (Reference 3).

There are no new regulatory commitments made in this letter. Please address any questions regarding this request to Mr. Edward D. Schrull at (423) 751-3850.

Respectfully,



J. W. Shea  
Vice President, Nuclear Regulatory Affairs and Support Services

cc:

NRC Regional Administrator - Region II  
NRC Resident Inspector – Watts Bar Nuclear Plant  
NRC Project Manager – Watts Bar Nuclear Plant  
Director, Division of Radiological Health - Tennessee State Department of Environment  
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