

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 11, 1979

Director of Nuclear Reactor Regulation
Attention: Mr. Thomas A. Ippolito, Chief
Branch No. 3
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Ippolito:

In the Matter of the)	Docket Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

Pursuant to 10 CFR 50 Section 50.55a(g), Browns Ferry Nuclear Plant units 1, 2, and 3 are subjected to inservice inspection and testing in accordance with the requirements of Section XI of the ASME Boiler and Pressure Vessel Code. Strict compliance with Federal regulations results in programs of inservice inspection and testing which are unwieldy with respect to development, review, and implementation. This situation imposes a burden on both TVA and NRC and results in unnecessary delays in program development by TVA and review by NRC. Enclosed is a proposal which will amend this situation by allowing TVA to conduct the programs at Browns Ferry using concurrent start dates for all three units. All details of the proposal and justification are contained in the enclosure.

Expeditious approval of this proposal by NRC will result in a more judicious use of time by both TVA and NRC. This has the potential for improving safety by allowing valuable manpower to be utilized in more urgent matters. This proposal helps to create a condition of standardization among the three units of the Browns Ferry Nuclear Plant, a condition which NRC has considered advantageous.

If we can be of any assistance to your staff in their review of this proposal, please get in touch with us.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

BROWNS FERRY NUCLEAR PLANT UNITS 1-3
DOCKET NOS. 50-259, 50-260, AND 50-296

CONCURRENT CYCLES OF INSERVICE INSPECTIONS
AND TESTING - COMPLIANCE WITH 10 CFR 50.55a(g)

Proposal

Pursuant to 10 CFR 50 Section 50.55a(g), inservice inspection and testing is performed at the three-unit Browns Ferry Nuclear Plant in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. Strict compliance with 10 CFR 50.55a(g) requires that each unit follow its own separate schedule of 40-month and 20-month inspection periods. It is proposed to perform future inservice inspection and testing at Browns Ferry according to a program of concurrent periods for the three units, i.e., have all three units begin 40-month and 20-month inspection periods on the same date. It is proposed to have all three units begin the next 40-month and 20-month period on January 1, 1980.

The date for start of the next 40-month periods for Browns Ferry units 1, 2, and 3 are June 1, 1979, December 15, 1979, and July 1, 1980, respectively. The concurrent cycle-start date of January 1, 1980, is proposed because it involves approximately equal and opposite shifts in time for the start dates of units 1 and 3 and a negligible shift in that for unit 2.

In addition, it is proposed to submit a single program description to describe each of the proposed programs of inservice inspection, inservice pump and valve testing, and hydrostatic pressure testing for all three units. Differences among the three units would be addressed in the program description.

Justification

1. There would be no decrease in the assured level of safety if the dates for start of the inspection and test periods were shifted at this time. All inspection and tests to be performed over a 40- or 20-month period would be performed as required.
2. All three units are basically identical in design with only minor differences in installed equipment. Consequently, a single document could be used to describe a program proposed for all three units.

Reasons

1. Although unlikely, under the present requirements of 10 CFR 50.55a(g)(4), a potential exists for each unit to be required to perform tests and inspections in accordance with different ASME code edition and addenda. It is, however, quite likely that one of the units would be required to follow an edition and addenda different from the other two. Such an arrangement would cause complications in program development and implementation. Review of the program by the NRC staff would also be made more complicated creating a potential for delay in completion of NRC review. Any significant delay in completion of program review and issuance of approval creates problems for both TVA and NRC.
2. Pursuant to 10 CFR 50 Section 50.55a(g)(4) the inservice inspection and testing programs must comply with the ASME code edition and addenda in effect 6 months before the start of each 40-month or 20-month inspection

period. Consequently, these programs are not finalized until this time. Therefore, even provided that all three units are to comply with the same code edition and addenda, three separate and distinct programs will exist, at least in theory. Although not a true triplication of effort, this regulation does result in some additional work, both by TVA in program development and implementation and by NRC in review of the program. Strict compliance with the regulation requires that a separate submittal be made for each unit for each of the three program descriptions.

Summary

The requirements of 10 CFR 50 Section 50.55a(g)(4) are inherently complicated and inefficient to some extent when applied to a multiple-unit facility. We believe that strict compliance with these regulations yields no increase in the assured level of safety of the facility but rather that a potential exists for safety to be compromised because of the numerous complications involved. These complications can be eliminated and the efficiency of inservice inspection and testing increased by implementing the program outlined in this proposal.