



1101 Market Street, Chattanooga, Tennessee 37402

CNL-22-013

January 6, 2022

10 CFR 50.55a

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

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Subject: **Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Request to Use a Portion of a Later Edition of the ASME Operation and Maintenance of Nuclear Power Plants**

Reference: NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004

In accordance with Title 10 of the *Code of Federal Regulations*, Section 50.55a, "Codes and standards," paragraph (f)(4)(iv), the enclosure to this submittal contains the Tennessee Valley Authority (TVA) request for use of a portion of the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants* (OM), 2017 Edition, to supplement the 2004 Edition through 2006 Addenda for the Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3.

Specifically, TVA requests to use the 2017 Edition, ISTA-2000 definition of "refueling outage."

refueling outage: applies to the normally scheduled once-per-cycle outage period in which the refueling mode, as defined by plant technical specifications, is entered.

TVA is requesting to use the definition of "refueling outage" from ASME OM, 2017 Edition, ISTA-2000, to clarify that the requirements of ASME OM, 2004 Edition through 2006 Addenda, ISTC-3521, "Category A and B Valves," subparagraphs (e) and (h) as well as ISTC-3522, "Category C Check Valves," subparagraphs (c) and (f) are only applicable to the normally scheduled once-per-cycle outage period. Requirements of the referenced ISTC paragraphs are essentially the same between the 2004 Edition through 2006 Addenda and the 2017 Edition.

This request is being made for the fourth ten-year inservice testing interval for BFN Units 1, 2, and 3. The applicable ASME OM Code of Record for the fourth interval is the 2004 Edition through 2006 Addenda for each unit. The fourth ten-year interval for BFN Units 1, 2, and 3 began on January 1, 2013 and is scheduled to end on August 30, 2022.

As stated in the Reference, Regulatory Information Summary 2004-12,

The request to use a later edition and addenda is not a relief request; it is simply a request to use a later Code. ...The amount of written documentation needed for a request to use a later Code edition and addenda is significantly less than for a relief request or a request to use an alternative requirement.

...


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. A discussion of the related requirements should be included in the letter to the NRC. The regulations do not specify when the letter must be submitted, only that it be submitted before using the proposed later Code edition and addenda.

There are no related requirements associated with the proposed later Code edition for consideration associated with this request.

TVA requests approval of this request by January 14, 2022, to support an upcoming BFN Unit 1 outage.

There are no new regulatory commitments contained in this letter. If you have any questions regarding this submittal, please contact Kimberly D. Hulvey, Senior Manager, Fleet Licensing at 423-751-3275.

Respectfully,

 Digitally signed by Carla Edmondson
Date: 2022.01.06 16:37:15 -05'00' for

James T. Polickoski
Director, Nuclear Regulatory Affairs

Enclosure:

Request to Use a Portion of a Later Edition of the ASME Operation and Maintenance of Nuclear Power Plants

cc:

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRC Project Manager - Browns Ferry Nuclear Plant

Enclosure

Request to Use a Portion of a Later Edition of the ASME Operation and Maintenance of Nuclear Power Plants

1. ASME Code Component(s) Affected

The affected components are all Browns Ferry Nuclear Plant (BFN) inservice testing program valves.

2. Applicable Code Edition and Addenda

The applicable American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants* (OM Code) Code of Record for the fourth interval is the 2004 Edition through 2006 Addenda for each unit. The fourth ten-year interval for BFN Units 1, 2, and 3 began on January 1, 2013, and is scheduled to end on August 30, 2022.

3. Proposed Subsequent Code Edition and Addenda (or Portion)

Tennessee Valley Authority requests approval to use a portion of the ASME OM Code, 2017 Edition for the for BFN Units 1, 2, and 3 inservice testing program. *Federal Register* dated May 4, 2020 (85 FR 26540) incorporates by reference the ASME OM Code, 2017 Edition, in Title 10 of the *Code of Federal Regulations*, Part 50.55a(b)(3). The specific paragraph to be used is a definition under ISTA-2000, "Definitions," shown here:

refueling outage: applies to the normally scheduled once-per-cycle outage period in which the refueling mode, as defined by plant technical specifications, is entered.

4. Related Requirements

There are no related requirements associated with the proposed later Code edition for consideration associated with this request. The requirements of ISTC-3521, "Category A and B Valves," subparagraphs (e) and (h) as well as ISTC-3522, "Category C Check Valves," subparagraphs (c) and (f) are not modified. The use of the definition in Section 3 of this request provides additional clarification when inservice testing must be performed.

5. Duration of Proposed Request

This request is being made for the fourth ten-year inservice testing interval for BFN Units 1, 2, and 3. The fourth ten-year interval for BFN Units 1, 2, and 3 began on January 1, 2013, and is scheduled to end on August 30, 2022.