

From: Kimberly Green
Sent: Wednesday, October 26, 2022 8:05 AM
To: Wells, Russell Douglas
Cc: Eckermann, Jeremy Beau
Subject: Request for Additional Information for Relief Request BFN-2-ISI-003 re Weld Examination Coverage (EPID L-2022-LLR-0049)

Dear Mr. Wells,

By email dated October 12, 2022, I transmitted the following draft request for information (RAI) to you regarding the subject relief request.

Introduction

By letter dated May 24, 2021 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML22144A138), the Tennessee Valley Authority (TVA) submitted Relief Request BFN-2-ISI-003 for Browns Ferry Nuclear Plant, Unit 2. Pursuant to section 50.55a(g)(5)(iii) of Title 10 of the *Code of Federal Regulations* (10 CFR), TVA requested relief from the weld examination coverage requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, for Categories B-D and R-A, for examinations performed during the fourth 10-year inservice inspection (ISI) interval.

Regulatory Basis

Pursuant to 10 CFR 50.55a(g)(5)(iii), if a licensee has determined that conformance with an ASME Code requirement is impractical for its facility, the licensee must notify the U.S. Nuclear Regulatory Commission (NRC or the Commission) and submit, as specified in 10 CFR 50.4, information to support the determinations. Determinations of impracticality in accordance with 10 CFR 50.55a must be based on the demonstrated limitations experienced when attempting to comply with the ASME Code requirements during the ISI interval for which the request is being submitted. Requests for relief made in accordance with 10 CFR 50.55a must be submitted to the NRC no later than 12 months after the expiration of the initial or subsequent 120-month inspection interval for which relief is sought.

Pursuant to 10 CFR 50.55a(g)(6)(i), the Commission will evaluate determinations under 10 CFR 50.55a(g)(5) that code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Request

In Section V of the relief request, TVA stated, in part:

In those cases where UT examinations could potentially have interrogated additional area, such as the inside surface of cast stainless valves by looking through a stainless steel weld, these were considered a

best effort examination. These are shown on the figures below by the represented angles. However, no additional coverage is credited.

The NRC staff notes that request BFN-2-ISI-003 did not include the results of best effort examination. State whether any flaws were detected in the far side volume examined by the best effort examination. If so (a) discuss how the detected flaws were dispositioned to ensure structural integrity and leak tightness of the welds, and (b) discuss the root cause analysis and extent of condition assessment performed to ensure such degradations would not impact structural integrity of similar welds subject to similar environments with limited examination coverage.

At your request, a clarification call between TVA and NRC staff was held on October 24, 2022. During the call, TVA stated that the examination results in Table 1 of the enclosure to the request reflects the results of the ASME Code-qualified/required ultrasonic (UT) examinations (i.e., near side exam) and the non-Code qualified UT examinations (i.e., far-side exam or “best effort exam”).

Therefore, based on this clarification, the NRC staff determined that no additional information is needed because the requested information is included in the results in Table 1.

If you have any questions, please contact me.

Sincerely,

Kimberly Green

Senior Project Manager
Division of Operating Reactor Licensing
U.S. Nuclear Regulatory Commission
301-415-1627

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"Eckermann, Jeremy Beau" <jbeckermann@tva.gov>
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"Wells, Russell Douglas" <rdwells0@tva.gov>
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