



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

October 23, 2000

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

Gentlemen:

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

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 2 AND 3 - NUREG-0619,
"BWR FEEDWATER NOZZLE AND CONTROL ROD DRIVE RETURN LINE NOZZLE
CRACKING," REVISED COMMITMENTS FOR FEEDWATER NOZZLE
NONDESTRUCTIVE EXAMINATION (TAC NOS. M08436 AND M08437)**

This letter provides notification that TVA has revised its commitments regarding NUREG-0619, "BWR Feedwater Nozzle and Control Rod Drive Return Line Nozzle Cracking," nondestructive examination (NDE) for the BFN Units 2 and 3 reactor pressure vessel feedwater nozzles. Specifically, TVA is adopting the NDE examination requirements provided in Table 6-1 of the BWR Owners Group (BWROG) Licensing Topical Report GE-NE-523-A71-0594, Revision 1, "Alternate BWR Feedwater Nozzle Inspection Requirements." The NRC staff has determined that the inspection program and schedule in GE-NE-523-A71-0594, Revision 1, is justified and provides an acceptable level of quality and safety in its safety evaluation transmitted by letter dated March 10, 2000, to the BWROG.

NUREG 0619 was transmitted to BWR licensees by generic letter dated November 13, 1980. In letters dated July 1, 1983, and August 17, 1983, TVA committed to the examination program and schedule contained in Table 2 of NUREG 0619. The NRC staff reviewed the BFN program and concluded in its safety evaluation dated June 6, 1984, that the BFN triple-sleeve sparger installation, leak monitoring procedures, and examination schedule were consistent with the applicable guidance in NUREG-0619. In that letter, the staff also acknowledged that

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ultrasonic (UT) examination technology would likely advance within the foreseeable future. As a result, the required NUREG-0619 (Table 2) dye penetrant (PT) examination of feedwater nozzles may, at some point in time, no longer be needed. The alternate examination requirements, contained in Table 6-1 of GE-NE-523-A71-0594, Revision 1, eliminate the need for PT examinations and define the UT examination interval based on the plant specific fracture mechanics analysis. It should also be noted that TVA's UT techniques satisfy the requirements of the 1989 Edition (no Addenda) of the American Society of Mechanical Engineers, Section XI Code for BFN Units 2 and 3.

TVA's commitment evaluation process, and subsequent revision of the NUREG-0619 feedwater nozzle NDE examination requirements for BFN Units 2 and 3, is consistent with the Nuclear Energy Institute's (NEI) "Guideline For Managing NRC Commitments." The NEI guidelines provide for timely notification to the NRC when changing commitments which meet specified criteria. Where timely notification is required, the guidelines recommend this notification be accomplished by supplementing the docketed correspondence containing the original commitments.

The enclosure to this letter contains TVA's revised NDE examination commitments for the BFN Units 2 and 3 feedwater nozzles. If you have any questions, please contact me at (256) 729-2636.

Sincerely,



T. E. Abney
Manager of Licensing
and Industry Affairs

Enclosure
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Enclosure

cc (Enclosure):

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ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 2 AND 3

NUREG-0619, "BWR FEEDWATER NOZZLE AND
CONTROL ROD DRIVE RETURN LINE NOZZLE CRACKING"

FEEDWATER NOZZLE AND SPARGER NONDESTRUCTIVE EXAMINATION (NDE),
REVISED COMMITMENTS BASED ON BWR OWNERS GROUP (BWROG)
LICENSING TOPICAL REPORT, GE-NE-523-A71-0594, REVISION 1

1. For BFN Unit 2, TVA will perform feedwater nozzle nondestructive examinations in accordance with Table 6-1 of BWROG Licensing Topical Report GE-NE-523-A71-0594, Revision 1, "Alternate BWR Feedwater Nozzle Inspection Requirements."
2. For BFN Unit 3, TVA will perform feedwater nozzle nondestructive examinations in accordance with Table 6-1 of BWROG Licensing Topical Report GE-NE-523-A71-0594, Revision 1, "Alternate BWR Feedwater Nozzle Inspection Requirements."