



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

August 10, 2001

10 CFR 50.55a

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

Gentlemen:

In the Matter of)	Docket Nos.	50-259	50-327
Tennessee Valley Authority)		50-260	50-328
			50-296	50-390

REVISION OF NONDESTRUCTIVE EXAMINATION (NDE) PROCEDURES FOR BROWNS FERRY NUCLEAR (BFN) PLANT, UNITS 1, 2, AND 3; SEQUOYAH NUCLEAR (SQN) PLANT, UNITS 1 AND 2, AND WATT'S BAR NUCLEAR (WBN) PLANT, UNIT 1, - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI INSERVICE INSPECTION (ISI) PROGRAM EXAMINATIONS

BFN Unit 2 second inspection interval ended on May 24, 2001. In accordance with 10 CFR 50.55a, a third inspection interval ISI Program was prepared to meet the requirements of the NRC approved ASME Section XI Code in effect on May 24, 2000. This Code is the 1995 Edition with the 1996 Addenda of Section XI (95A96) of the ASME Boiler and Pressure Vessel Code. When the BFN Unit 2 ISI Program was updated to the 95A96 Code requirements, new/revised NDE procedures were required to implement an ISI Program in accordance with 95A96 Code.

BFN Units 1 and 3, SQN Units 1 and 2, and WBN Unit 1 ISI Programs are currently prepared to ASME Section XI Editions and Addenda prior to the 95A96 Code. Prior to the BFN Unit 2 ISI Program update to the 95A96 Code, TVA utilized a common set of procedures for NDE inspection at all of the operating units, BFN Units 2 and 3, SQN Units 1 and 2, and WBN Unit 1.

A047

In conjunction with the BFN Unit 2 update of the ISI Program, TVA intends to update all NDE procedures to be used for the ASME Section XI examinations to the 95A96 ASME Section XI Code requirements. This approach will allow TVA to continue to use one set of procedures for all sites and utilize the latest NRC approved NDE techniques. In addition, this approach is in agreement with the established guidelines for the use of the latest techniques for ultrasonic examination procedures mandated in 10 CFR 50.55a(g)(6)(ii)(C) on the implementation of ASME Section XI Appendix VIII. The upgrade to the 95A96 Code requirements will encompass all aspects of NDE from personnel certifications and qualifications to evaluation of examination results. The areas of upgrade and reference paragraphs of the 95A96 ASME Section XI Code are as follows:

- Examination Method - Subarticle IWA-2200 up to and including Paragraph IWA-2240 and portions of Appendices IV, VII, and VIII. In the case of Appendix VIII and the referenced Appendix VII, TVA will comply with these requirements through the use of the Performance Demonstration Initiative (PDI) program document, "PDI Program Description," Revision 1, Change 1, as allowed in the discussion on the proposed rule change in the *Federal Register*, Volume 64, No. 183, page 51390, (see Section 2.7) published on September 22, 1999, except where specific relief has been requested and granted.

Note: TVA has submitted two generic relief requests on the requirements of Appendix VIII in ISI Program relief requests PDI-1 and PDI-2 in a letter to NRC dated February 23, 2001. The submittal for PDI-2 was revised in a letter to the NRC dated July 9, 2001.

- Qualification of Nondestructive Examination Personnel - Subarticle IWA-2300
- Weld Reference System - Subarticle IWA-2600 up to and including Paragraph IWA-264
- Standards for Examination Evaluation - Articles IWA-3000, IWB-3000, IWC-3000, IWD-3000, and IWF-3000

U.S. Nuclear Regulatory Commission

Page 3

August 10, 2001

In accordance with 10 CFR 50.55a(b)(2)(vi), nondestructive examinations of TVA primary containment structures are performed to the requirements of Articles IWE and IWL of the 1992 Edition with addenda through the 1992 Addenda (92A92). As part of this upgrade of NDE procedures to the 95A96 code, TVA will continue to perform the examination of containment structures to the 92A92 Code program requirements with the exception that the qualifications of NDE personnel for ultrasonic examinations will be in accordance with the 95A96 Code requirements.

The ASME Section XI Codes utilized for the ISI Programs for weld selection (which included areas and volume to be examined), scheduling, and reporting (Article IWA-6000) are not impacted by these changes.

Since the use of the 95A96 Code requirements as described above have been approved for use by the NRC, TVA will implement the related requirements in accordance with 10 CFR 50.55a(g)(4)(iv), except as required and allowed in 10 CFR 50.55a (as noted above). Based upon our discussions with the NRC on June 27, 2001, no further correspondence from the NRC is expected by TVA since this is a complete update of the NDE Program to the latest endorsed NRC code. Similar correspondence of this type was submitted by TVA to the NRC in a letter dated November 15, 1991 and subsequently acknowledged by a letter from the NRC dated April 24, 1992.

TVA intends to implement these processes and procedures as necessary to support future NDE work. There are no regulatory commitments identified in this letter.

If you have any questions, or if we can be of any assistance in this matter, please contact Susan Ferrell at (423) 751-7737.

Sincerely,



Mark J. Burzynski
Manager
Nuclear Licensing

cc: See page 4

U.S. Nuclear Regulatory Commission

Page 4

August 10, 2001

cc: Mr. R. W. Hernan, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2739

Mr. K. N. Jabbour, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2739

Mr. L. Mark Padovan, Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2739

NRC Senior Resident Inspector
Browns Ferry Nuclear Plant
10833 Shaw Road
Athens, Alabama 35611

NRC Senior Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy Daisy, Tennessee 37379

NRC Senior Resident Inspector
Watts Bar Nuclear Plant
1260 Nuclear Plant Road
Spring City, Tennessee 37381