

February 5, 2002

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

Gentlemen:

In the Matter of ) Docket No. 50-296  
Tennessee Valley Authority )

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 3 - AMERICAN SOCIETY  
OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION  
PROGRAM (ISI) - CLARIFICATION TO REQUEST FOR RELIEF 3-ISI-11  
(TAC NO. MB2560)**

TVA submitted, by letter dated August 13, 2001, request for relief 3-ISI-11 for the BFN Unit 3 ASME Section XI Inservice Inspection Program for the Browns Ferry Nuclear Plant.

Request for relief 3-ISI-11 uses the requirements of ASME Code Case N-648-1, "Alternative Requirements for Inner Radius Examination of Class 1 Reactor Vessel Nozzles, Section XI, Division I," for examination of the BFN Unit 3 reactor pressure vessel nozzles using a direct (VT-1) examination rather than the Code prescribed volumetric examination. During its review of request for relief 3-ISI-11, the NRC staff identified a question regarding TVA's proposed alternate examination.

TVA and the NRC staff held a teleconference on December 6, 2001, to discuss the NRC question. During that teleconference, the NRC staff questioned whether TVA's proposed visual (VT-1) examination was a direct visual exam or a remote visual exam. TVA stated that the examinations for the RPV head vent and spare nozzles (N7, N6A, and N6B) were intended to be conducted using a direct visual examination performed in accordance with ASME Section XI, VT-1 requirements.

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A subsequent teleconference was held between TVA and the NRC staff on January 29, 2002, to further clarify TVA's proposed alternate examination. This letter provides confirmation of the discussions held between TVA and the NRC staff in the December 6, 2001, and January 29, 2002 teleconferences. As a result, TVA will update the BFN Unit 3 ASME Section XI, ISI Program to explicitly show that the visual examination of the RPV head nozzles (N7, N6A, and N6B) is performed using a direct enhanced visual (VT-1) examination, capable of a 1-mil resolution, performed in accordance with ASME Section XI, VT-1 requirements.

As stated in our letters dated August 13, 2001, and January 9, 2002, TVA requests review of this request for relief to support the Unit 3 Cycle 10 (Spring 2002) refueling outage.

If you have any questions, please contact me at (256) 729-2636.

Sincerely,

original signed by

T. E. Abney  
Manager of Licensing  
and Industry Affairs

cc: See Page 3

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(Via NRC Electronic Distribution)  
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