

October 30, 2002

MEMORANDUM TO: Allen G. Howe, Chief, Section 2  
Project Directorate II  
Division of Licensing Project Management

FROM: Kahtan N. Jabbour, Senior Project Manager, Section 2  
Project Directorate II */RA/*  
Division of Licensing Project Management

SUBJECT: BROWNS FERRY UNIT 2 DRAFT QUESTIONS REGARDING RELIEF  
REQUESTS (2-ISI-6, 2-ISI-13, AND 2-ISI-15) CONCERNING ASME  
SECTION XI, INSERVICE INSPECTION PROGRAM (TAC NO. MB5309)

The attached draft questions (Attachment 1) were faxed to the licensee to allow them to prepare for a conference call. However, in lieu of the call, the licensee provided its responses to the draft questions (Attachment 2). The staff indicated that the responses are acceptable. On this basis, the licensee stated that it will document the questions and its responses in the near future.

Docket No: 50-260

Attachments: As stated

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OFFICE	PDII-2/PM		PDII-2/LA		PDII-2/SC			
NAME	KJabbour		BClayton		AHowe			
DATE	10/ /2002		10/28/2002		10/ /2002			

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## DRAFT

Request for Additional Information  
Browns Ferry Nuclear Plant, Unit 2 (BFN-2)  
ASME Section XI, Inservice Inspection Program Request for Relief

1. Request for reliefs 2-ISI-6 and 2-ISI-13 requests relief from for nine reactor pressure vessel (RPV) nozzle-to vessel full penetration welds and for the RPV standby liquid control nozzle inside radius section, respectively. The proposed examination of the nine RPV nozzle to vessel welds is to be performed using ultrasonic examination from the outside of the vessel. The percent coverage for these nozzles is 56% to 72%. The proposed examination of RPV standby liquid control nozzle inside radius is to be visual (VT-2) examination in conjunction with the Class 1 system leakage test. The Advanced Inservice Reactor Inspection System 21 device (AIRIS 21) and Enhanced Data acquisition System-II equipment (EDAS<sup>TM</sup>-II) is used to ultrasonically inspect longitudinal shell welds from the inside surface of the RPV.

a) Identify the percent of coverage for flaws located at the clad and nozzle weld interface when ultrasonic examination is performed in accordance with request for relief 2-ISI-6.

b) Explain why the AIRIS 21 and EDAS<sup>TM</sup>-II can not be utilized for examination of the welds and inside radius section discussed in request for relief 2-ISI-6 and 2-ISI-13.

c) Identify the increase in NDE examination coverage expected if the AIRIS 21 and EDAS<sup>TM</sup>-II equipment can be utilized for ultrasonic examination.

2. Pertaining to Relief Request 2-ISI-15, the licensee identified Code Case N-577, "Risk-Informed Requirements for Class 1, 2, or 3 Piping, Method A," as being the applicable Code requirement. The NRC has not approved this Code Case for use. However, N-577 does serve as a reference to relate the IGSCC welds, which fall under Browns Ferry's risk-informed ISI (RI-ISI) program, back to the true Code requirement, which is IWB-2500, Table IWB 2500-1, Figure IWB-2500-8(c). Therefore, relief should be requested from the requirement of ASME Code, Section XI, IWB-2500, Table IWB-2500-1. Please indicate which examination categories and item numbers from IWB-2500 apply to these welds (i.e. B-J, B-F, etc.)

3. In the licensee's basis for relief request 2-ISI-15 they state:

"Welds GR-2-15(OL) and DRHR-2-03 were examined in April 1999, prior to the Performance Demonstration Initiative (PDI) Program requirements being mandated by 10 CFR 50.55a(b)(2)(xv)(A)(2), utilizing NDE methods and techniques to the requirements of ASME Section XI Code, **1989** Edition, No Addenda."

Is **1989** supposed to read **1986**, since that is the applicable Section XI code edition for the relief?