

March 1, 2004

Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNIT 1 — RELIEF REQUESTS
NOS. 1-CISI-1, 1-CISI-2, AND 1-CISI-3 RELATED TO CONTAINMENT
INSERVICE INSPECTION PROGRAM (TAC NOS. MC0608, MC0609, AND
MC0610)

Dear Mr. Scalice:

By letter dated August 29, 2003, the Tennessee Valley Authority (TVA) submitted three relief requests (RRs), Nos. 1-CISI-1, 1-CISI-2, and 1-CISI-3, for Browns Ferry Nuclear Plant (BFN), Unit 1.

The U.S. Nuclear Regulatory Commission staff has reviewed and evaluated the information provided in support of these RR. Based on the conclusions contained in the enclosed safety evaluation, the staff finds the following:

- For RR 1-CISI-1, relief is authorized pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(a)(3)(ii) on the basis that performance of the required visual examinations of containment penetration seals and gaskets would result in hardship without a compensating increase in the level of quality and safety, and the proposed leak rate testing in accordance with 10 CFR Part 50, Appendix J would provide reasonable assurance of containment pressure integrity.
- For RR 1-CISI-2, relief is authorized pursuant to 10 CFR 50.55a(a)(3)(i), on the basis that the licensee's proposed leak rate testing is in accordance with 10 CFR Part 50, Appendix J and will provide an acceptable level of quality and safety for the protection of the containment pressure boundary integrity as an alternative to the required visual examinations of repaired or replaced areas in connection with system pressure testing.
- For RR 1-CISI-3, relief is authorized pursuant to 10 CFR 50.55a(a)(3)(ii), on the basis that performance of the required successive examinations of containment components that have been repaired and are acceptable for continued service would result in hardship without a compensating increase in the level of quality and safety.

J. Scalice

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Granting relief pursuant to 10 CFR 50.55a(a)(3)(i) and 10 CFR 50.55a(a)(3)(ii) is authorized by law and will not endanger the life or property or the common defense and security, and is 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. Relief is authorized for the above requests for the duration of the first 10-year containment inspection interval for BFN Unit 1.

Sincerely,

/RA/

Allen G. Howe, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-259

Enclosure: Safety Evaluation

cc w/enclosure: See next page

B. Scalice

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Granting relief pursuant to 10 CFR 50.55a(a)(3)(i) and 10 CFR 50.55a(a)(3)(ii) is authorized by law and will not endanger the life or property or the common defense and security, and is 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. Relief is authorized for the above requests for the duration of the first 10-year containment inspection interval for BFN Unit 1.

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

FIRST 10-YEAR CONTAINMENT INSPECTION INTERVAL

RELIEF REQUESTS 1-CISI-1, 1-CISI-2, AND 1-CISI-3

TENNESSEE VALLEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT, UNIT 1

DOCKET NO. 50-259

1.0 INTRODUCTION

By letter dated August 29, 2003, the Tennessee Valley Authority (TVA, the licensee) submitted three relief requests (RRs), Nos. 1-CISI-1, 1-CISI-2, and 1-CISI-3, for the first 10-Year containment inspection interval for Browns Ferry Nuclear Plant, Unit 1 (BFN Unit 1). These relief requests propose several alternatives to the requirements of Subsection IWE of Section XI of the American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* (Code), 1992 Edition with 1992 Addenda. The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided in support of these RRs, and its safety evaluation is provided below.

2.0 REGULATORY REQUIREMENTS

In the *Federal Register* (FR) dated August 8, 1996 (61 FR 41303), the NRC amended its regulations to incorporate by reference the 1992 Edition with 1992 Addenda of Subsections IWE and IWL of Section XI of the ASME Code. Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of ASME Code Class CC (concrete containment), and Class MC (metallic containment) components of light-water cooled power plants. The effective date for the amended rule was September 9, 1996, and it requires the licensees to incorporate the new requirements into their ISI plans and to complete the first containment inspection by September 9, 2001. However, a licensee may propose alternatives to or submit a request for relief from the requirements of the regulations pursuant to 10 CFR 50.55a(a)(3) and 10 CFR 50.55a(g)(5).

Enclosure

3.0 TECHNICAL EVALUATION

3.1 RELIEF REQUEST 1-CISI-1

Code Requirements:

Table IWE-2500-1, Examination Category E-D, Items E5.10 and E5.20, requires seals and gaskets on airlocks, hatches, and other devices to be VT-3 visually examined once each inspection interval to assure containment leak-tight integrity.

Code Requirement from which Relief is Requested:

Relief is requested from performing the visual examination, VT-3, on the metal containment seals and gaskets.

Basis for Relief Request (as stated):

The design configuration of the connections which include seals and gaskets precludes visual examination of the seals and gaskets without disassembly of the connection. Testing the seals and gaskets in accordance with 10 CFR 50, Appendix J, provides adequate assurance of the leak-tight integrity of the seals and gaskets.

Alternative Examination (as stated):

The leak-tight integrity of seals and gaskets is tested in accordance with 10 CFR 50, Appendix J. Type B testing is performed at least once each in-service inspection interval as required by 10 CFR 50, Appendix J, in addition to the Type B tests performed prior to disassembly (unless expected based on performance history) and after re-assembly. Appendix J, Type A tests provide additional assurance that there is no significant leakage through the containment pressure boundary. No additional alternatives are proposed.

Justification for Granting Relief (as stated):

10 CFR 50.55a currently requires the use of either the 1992 Edition of ASME Section XI, Subsection IWE, with the 1992 Addenda, or the 1995 Edition of ASME Section XI, Subsection IWE, with the 1996 Addenda, as modified and supplemented further therein for the performance of containment inspections. BFN Unit 1 is currently under the 1992 Edition of ASME Section XI, Subsection IWE with the 1992 Addenda. These examinations include visual examinations of seals and gaskets. The penetrations discussed below contain seals and gaskets.

Electrical Penetrations

Electrical penetrations use a header plate(s), or header plate canister assembly, welded to the containment penetration nozzle. Modules through which electrical conductors pass are installed in the header plate(s).

The electrical penetrations installed at BFN Unit 1 are manufactured by Physical Sciences, General Electric, and Conax (three BFN Unit 1 Physical Sciences penetrations are being replaced with Conax penetrations during the current outage). Physical Sciences penetrations are canister type and consist of compressed glass penetration seals and hermetically-sealed connector receptacles mounted in steel heater plates. The seals of this type of penetration are inaccessible. The General Electric penetrations installed are modular in design. Modular type General Electric penetrations are sealed by redundant epoxy barriers and metallic or elastomer O-rings. The modular General Electric penetration seals are completely inaccessible without disconnecting cabling and removal of the modules. Conax penetrations use a set of compression fittings and may include sealant compounds and/or O-rings. The Conax penetration seals are completely inaccessible without disconnecting cabling and removal of the modules.

Containment Personnel Airlocks, Drywell Head, Equipment Hatches, and Flanges and Hatches

The personnel airlock doors utilize an inner and outer door with O-ring seals to ensure leak-tight integrity. These airlocks also contain other gaskets and seals for items such as the handwheel shaft seals, electrical penetrations, and equalizing valves which require disassembly to gain access to the gaskets and seals. The drywell head, equipment hatches, and all flanges and hatches utilize double [O-ring] seals or gaskets.

Seals and gaskets receive a 10 CFR 50, Appendix J, Type B test. As noted in 10 CFR Part 50, Appendix J, the purpose of the Type B test is to measure leakage of containment penetrations whose design incorporates resilient seals, gaskets, or sealant compounds or flexible metal seal assemblies. Examination of seals and gaskets require the joints, which are proven adequate through Appendix J testing, to be disassembled. For electrical penetrations, this would involve performance of an Appendix J, Type B test prior to disassembly (unless expected based on performance history); de-termination of cables at electrical penetrations if enough cable slack is not available; disassembly of the joint (if designed to permit disassembly); removal and VT-3 visual examination of the seals and gaskets; re-assembly of the joint; re-termination of the cables if necessary; post maintenance testing of the cables; and performance of an Appendix J, Type B test upon final assembly. Disassembly and reassembly of these penetrations impose the risk that equipment could be damaged. Further, a VT-3 examination does not ensure that these items, when reassembled, will not leak.

Note 1 for Examination Category E-D was modified in the 1992 Edition, 1993 Addenda, of ASME Section XI to state that sealed and gasket connections need not to be disassembled solely for performance of examinations. However, without disassembly, all of the surface of the seals and gaskets would be inaccessible.

Containment personnel airlocks receive a Type B test within seven days after each opening. For periods of multiple containment entries where the airlock doors are routinely used for access more frequently than once every seven days, door seals may be tested once every thirty days. Since the Type B tests assure the leak-tight integrity of primary containment, the performance of a VT-3 visual examination would not increase the level of safety or quality.

Type B tests are required prior to disassembly (unless expected based on performance) and following re-assembly of all equipment hatches. Since the Type B tests assure the leak-tight integrity of primary containment, the performance of a VT-3 visual examination would not increase the level of safety or quality. Further, prior to hatch re-assembly, the O-ring seals are visually inspected as a normal maintenance practice.

For other flanges and hatches, should the connection(s) be disassembled, a Type B test is required prior to disassembly (unless expected based on performance) and upon final assembly prior to startup. Since the Type B tests assure the leak-tight integrity of primary containment, the performance of the VT-3 visual examination would not increase the level of safety or quality.

Unacceptable degradation of airlock, hatch, or flange seals/gaskets would be revealed during Appendix J testing. If the measured leakage rate of these penetrations exceeds established limits, corrective action would be taken and the component re-tested. Repair or replacement of seals and gaskets is not subject to ASME Section XI rules in accordance with Paragraph IWA-4111(b)(5).

Containment leakage is verified by 10 CFR 50, Appendix J, Type A tests. Although the Type A test does not verify individual penetration leakage, it does provide additional assurance that there is no significant leakage through the containment pressure boundary, which includes all sealed penetrations.

The visual examination of seals and gaskets in accordance with Table IWE-2500-1, Examination Category E-D, Items E5.10 and E5.20, would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Testing the seals and gaskets in accordance with 10 CFR 50, Appendix J provides adequate assurance of the leak-tight integrity of the seals and gaskets.

In addition, the requirement to examine seals and gaskets has been removed in the 1998 Edition of ASME Section XI Code. Therefore, pursuant to 10 CFR 50.55a(a)(3)(ii), TVA requests that relief be granted.

NRC Staff Evaluation:

In lieu of performing the VT-3 examinations for containment penetration seals and gaskets, the licensee proposes to use the current program for leakage testing containment penetrations in accordance with 10 CFR Part 50, Appendix J.

In its request, the licensee stated that because most of the surfaces of seals and gaskets associated with these penetrations are not accessible for examination when the penetration is assembled, containment penetration seals and gaskets must be disassembled and re-assembled for the purpose of performing the VT-3 visual examination. These activities (disassembly and re-assembly of seals and gaskets) associated with a VT-3 visual examination would introduce the possibility of component damage that would not otherwise occur. In addition, a VT-3 examination does not ensure that these items, when reassembled, will not leak. The periodic test (Type B test) of penetrations in accordance with 10 CFR Part 50, Appendix J, will detect local leakage and measure leakage across the leakage-limiting boundary of containment penetrations whose design incorporates resilient seals, gaskets, sealant compounds, and electrical penetrations fitted with flexible metal seal assemblies. If unacceptable leakage is identified during the test, corrective measures will be taken. Also, the 1993 Addenda to ASME Code, Section XI has incorporated changes recognizing that disassembly of joints for the sole purpose of performing visual examination is unwarranted. Requiring the licensee to disassemble components for the sole purpose of inspecting seals and gaskets would place a significant hardship on the licensee without a compensating increase in the level of quality and safety.

Based on the discussion above, the staff concludes that the alternative proposed by the licensee will provide reasonable assurance of the functionality and integrity of the containment penetration seals and gaskets during the testing required by 10 CFR Part 50, Appendix J. The proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specific requirements of the Code would result in hardship without a compensating increase in the level of quality and safety.

3.2 RELIEF REQUEST 1-CISI-2

Code Requirements:

Table IWE-2500-1, Examination Category E-P, Item E9.10, requires a system leakage test be performed for each repair, modification, or replacement. Paragraph IWE-5240 states that the requirements of Paragraph IWA-5240 are applicable for visual examinations performed following repair, modification, or replacement. Paragraph IWA-5240 provides requirements for the performance of a VT-2 visual examination for the detection of leakage.

Code Requirement from which Relief is Requested:

Relief is requested from performing the VT-2 visual examination of Paragraph IWA-5240 in connection with system pressure testing following repair, modification, or replacement as required by Paragraph IWE-5240.

Basis for Relief Request (as stated):

Table IWE-2500-1, Examination Category E-P, Item E9.10, requires that a leakage test be performed in accordance with 10 CFR 50, Appendix J following each repair, modification, or replacement. Performance of the Appendix J testing would detect any leakage which may exist in the containment pressure retaining boundary. In addition, the requirements of Article IWA-4000 must be met following repairs and replacements, including modifications. Performance of

a VT-2 visual examination, as required by Paragraph IWE-5240, does not provide additional assurance of detection of containment pressure boundary leakage.

Alternative Examination (as stated):

In those cases where TVA elects not to perform a VT-2 visual examination of repaired or replaced areas during the 10 CFR 50, Appendix J leak rate testing, a VT-1 visual examination will be performed during or following the 10 CFR 50, Appendix J leak rate testing.

Justification for Granting Relief (as stated):

10 CFR 50.55a currently requires the use of either the 1992 Edition of ASME Section XI, Subsection IWE, with the 1992 Addenda, or the 1995 Edition of ASME Section XI, Subsection IWE, with the 1996 Addenda as modified and supplemented further therein for performance of containment examinations. BFN Unit 1 is currently under the 1992 Edition of ASME Section XI, Subsection IWE, with the 1992 Addenda. Paragraph IWE-5210 states that except as noted within Paragraph IWE-5240, the requirements of Article IWA-5000 are not applicable to Class MC or Class CC components. Paragraph IWE-5240 states that the requirements of Paragraph IWA-5240 (corrected from IWA-5246 to IWA-5240 in 1993 Addenda) for visual examinations are applicable. Paragraph IWA-5240 identifies requirements for performance of a VT-2 visual examination. Visual examinations (VT-2) are conducted to detect evidence of leakage from pressure retaining components, with or without leakage collection systems, during the conduct of a system pressure test. In addition, personnel performing VT-2 visual examinations are required to be qualified in accordance with Subarticle IWA-2300 of ASME Section XI.

Table IWE-2500-1, Examination Category E-P, Item E9.10, identifies the examination method of 10 CFR 50, Appendix J and does not specifically identify a VT-2 visual examination. 10 CFR 50, Appendix J provides requirements for testing as well as acceptable leakage criteria. These tests are performed by qualified Appendix J test personnel and utilize calibrated equipment to determine leak rate acceptability. Additionally, 10 CFR 50.55a(b)(2)(ix)(E) requires a General Visual examination of the containment each period that would identify structural degradation that may contribute to leakage.

Repairs and replacements, including modifications, to the containment pressure retaining boundary and to integral attachments must be performed in accordance with Article IWA-4000. This article requires, among other things, preparation of a repair and replacement plan; requires repairs and installation of replacements, including performance of nondestructive examinations, to be performed in accordance with the original edition or later editions of the construction code or Section III; and requires performance of preservice inspections in accordance with Subsection IWE. Repairs and replacements of pressure retaining MC components and their integral attachments at BFN are performed in accordance with TVA's repair and replacement program. This program specifies the repair

methods and nondestructive examinations necessary to ensure that the original quality and construction requirements of the containment vessel are met.

Performance of the Appendix J testing will detect leakage which may not exist in the containment pressure retaining boundary. Performance of the General Visual examination and compliance with Article IWA-4000 will provide added assurance of the structural integrity of the containment pressure retaining boundary. Performance of a visual examination (VT-2) in addition to these requirements would not provide additional assurance for detection of containment pressure boundary leakage.

Pressure testing in accordance with 10 CFR 50, Appendix J, provides an adequate level of quality. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), TVA requests that relief be granted.

NRC Staff Evaluation:

In lieu of performing the VT-2 visual examination of Paragraph IWA-5240 in connection with system pressure testing following repair, replacement or modification, as required by Paragraph IWE-5240, the licensee proposed that testing will be conducted in accordance with 10 CFR Part 50, Appendix J. The licensee also indicated that a VT-1 visual examination will be performed during or following the 10 CFR Part 50, Appendix J testing.

In the "Basis for Relief Request" and "Justification for Granting Relief" sections, the licensee justified that repairs and replacements, including modifications, to the containment pressure retaining boundary and to integral attachments must be performed in accordance with Article IWA-4000. This article requires preparation of a repair and replacement plan; requires repairs and installation of replacements, including performance of nondestructive examinations, to be performed in accordance with the original edition or later editions of the construction code or Section III; and requires performance of preservice inspections in accordance with Subsection IWE. Also, Table IWE-2500-1 (examination category E-P) requires only an examination method of 10 CFR Part 50, Appendix J for the containment vessel pressure retaining boundary following each repair, replacement, or modification and does not specifically identify a VT-2 visual examination. In addition, 10 CFR Part 50, Appendix J provides requirements for testing including acceptable leakage criteria and the tests are performed by Appendix J test personnel by utilizing calibrated equipment to determine acceptability. Furthermore, 10 CFR 50.55a(b)(2)(x)(E) requires a general visual examination of the containment each period that would identify any structural degradation that may contribute to leakage. Moreover, the licensee committed that a VT-1 visual examination will be performed during or following the 10 CFR Part 50, Appendix J testing.

From the discussion above, the staff finds that the alternative examination proposed by the licensee will provide an acceptable level of quality and safety for protecting the containment pressure boundary integrity. On this basis, the staff concludes that the alternative proposed by the licensee is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

3.3 RELIEF REQUEST 1-CISI-3

Code Requirements:

Paragraph IWE-2420(b) requires that when component examination results require evaluation of flaws, evaluation of areas of degradation, or repairs in accordance with Article IWE-3000, and the component is found to be acceptable for continued service, the areas containing such flaws, degradation, or repairs shall be re-examined during the next inspection period listed in the schedule of the inspection program of Paragraph IWE-2411 or Paragraph IWE-2412, in accordance with Table IWE-2500-1, Examination Category E-C.

In accordance with Paragraph IWE-2420(c), when the re-examinations required by Paragraph IWE-2421(b) reveal that the flaws, areas of degradation, or repairs remain essentially unchanged for three consecutive inspection periods, the areas containing such flaws, degradation, or repairs no longer require augmented examination in accordance with Table IWE-2500-1, Examination Category E-C.

Code Requirement from which Relief is Requested:

Relief is requested from the requirement of Paragraphs IWE-2420(b) and IWE-2420(c) to perform successive examination of repaired areas.

Basis for Relief Request (as stated):

Examination results, which detect flaws or areas of degradation which exceed the acceptance criteria of IWE-3000, require engineering evaluation, repair, or replacement of the flaw or areas of degradation. Paragraphs IWE-2420(b) and IWE-2420(c) require performance of successive examinations for flaws or areas of degradation accepted for continued service based on engineering evaluation or repair. The purpose of a repair is to restore the component to an acceptable condition for continued service in accordance with the acceptance standards of Article IWE-3000. If the repair has restored the component to an acceptable condition, successive examinations are not warranted.

Alternative Examination (as stated):

Successive examinations in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) will not be required for areas repaired in accordance with IWA-4000. Successive examinations will be performed in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) for components whose examination results detect flaws or areas of degradation that exceed the acceptance criteria of IWE-3000 and are found acceptable for continued service without repair based on an engineering evaluation.

Justification for Granting Relief (as stated):

10 CFR 50.55a currently requires the use of either the 1992 Edition of ASME Section XI, Subsection IWE, with the 1992 Addenda, or the 1995 Edition of ASME Section XI, Subsection IWE, with the 1996 Addenda as modified and

supplemented further therein for performance of containment examinations. BFN Unit 1 is currently under the 1992 Edition of ASME Section XI, Subsection IWE, with the 1992 Addenda. Examination results, which detect flaws or areas of degradation which exceed the acceptance criteria of Article IWE-3000, require engineering evaluation, repair, or replacement of the flaw or areas of degradation. The purpose of a repair is to restore the component to an acceptable condition for continued service in accordance with the acceptance standards of Article IWE-3000. Paragraph IWA-4150 requires the owner to conduct an evaluation of the suitability of the repair including consideration of the cause of failure.

If a repair has restored the component to an acceptable condition, successive examinations are not warranted. If the repair is not suitable, then the repair does not meet Code requirements and the component is not acceptable for continued service. Paragraphs IWB-2420(b), IWC-2420(b), and IWD-2420(b) for Class 1, 2, and 3 components, respectively, do not require a repair to be subject to successive examination requirements. Furthermore, if the repair area is subject to accelerated degradation, it would require augmented examination in accordance with Paragraph IWE-1241 and Table IWE-2500-1, Examination Category E-C.

The successive examination of repairs in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) constitutes a burden on TVA without a compensating increase in quality or safety.

The requirement to perform successive examinations of repaired areas has been removed from Paragraphs IWE-2420(b) and IWE-2420(c) in the 1998 Edition of ASME Section XI. Therefore, pursuant to 10 CFR 50.55a(a)(3)(ii), TVA requests that relief be granted.

NRC Staff Evaluation:

In lieu of performing successive examinations in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) for areas repaired in accordance with Article IWA-4000, the licensee proposed an alternative to perform the successive examinations only for components whose examination results detect flaws or areas of degradation that exceed the acceptance criteria of IWE-3000 and are found acceptable for continued service without repair based on an engineering evaluation.

The staff finds that the purpose of a repair is to restore the component to an acceptable condition for continued service in accordance with the acceptance standards of Article IWE-3000. After repairs are complete, IWA-4150 requires licensees to evaluate the suitability of the repair. When a repair is required because of failure of an item, the evaluation shall consider the cause of failure to ensure that the repair is suitable. Considering that the failure mechanism is identified and corrected as required and the repair receives pre-service examinations, as required, the proposed alternative will provide reasonable assurance of structural integrity. In doing this, the requirements of successive examinations are deemed to be unnecessary. Furthermore, IWB-2420(b), IWC-2420(b), and IWD-2420(b) do not require the

successive inspection of repairs for ASME Code Class 1, 2, and 3 components as required in IWE-2420(b) for ASME Code Class MC components.

The licensee's proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specific code requirements would result in hardship without a compensating increase in the level of quality and safety.

4.0 CONCLUSION

The NRC staff concludes that for RR 1-CISI-2, the licensee's proposed alternative will provide an acceptable level of quality and safety. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for BFN Unit 1. For RRs 1-CISI-1 and 1-CISI-3, the staff concludes that compliance with the code requirements would result in hardship without a compensating increase in the level of quality and safety, and the licensee's proposed alternatives will provide reasonable assurance of containment pressure integrity. Therefore, these proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii) for BFN Unit 1.

The relief and authorizations for the above requests are for the duration of the first 10-year containment inspection Interval. All other ASME Code, Section XI requirements for which relief was not specifically requested and approved in this request remain applicable, including third party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: T. Cheng

Date: March 1, 2004

Mr. J. A. Scalice
Tennessee Valley Authority

BROWNS FERRY NUCLEAR PLANT

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