

December 7, 2004

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop: OWFN P1-35
Washington, D.C. 20555-0001

Gentlemen:

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

BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 - AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION (ISI) PROGRAM - REQUEST TO USE SUBSEQUENT EDITION AND ADDENDA OF ASME SECTION XI CODE FOR CORRECTIVE ACTION REQUIREMENTS FOR LEAKAGE AT BOLTED CONNECTIONS

Subject to NRC approval, 10 CFR 50.55a(g)(4)(iv) permits the use of portions of subsequent editions and addenda of ASME Section XI Code, which have been incorporated by reference in paragraph (b) of that section, for inservice examination of components and system pressure tests. In accordance with the provisions of 10 CFR 50.55a(g)(4)(iv), TVA seeks to adopt the corrective action requirements for leakage at bolted connections specified in the 1998 Edition, 1999 Addenda of the ASME Section XI Code, subarticle IWA-5250(a)(2), for BFN Units 1, 2, and 3. The Code of Record for the BFN System Pressure Test Programs for Units 1 and 2 is the 1995 Edition, 1996 Addenda and for Unit 3, the 1989 Edition, no Addenda.

Subarticle IWA-5250, Corrective Action, has not changed substantially since the 1989 Edition with the exception of the IWA-5250(a)(2) paragraph. Subarticle IWA-5250(a)(2) of the 1999 Addenda specifies limits of applicability for this paragraph. The required actions of this paragraph are limited to bolted connections in systems bolated for the purpose of controlling reactivity.

U.S. Nuclear Regulatory Commission
Page 2
December 7, 2004

The modification to this paragraph provides clarification to the application and limitations of the requirements. Implementation of this new paragraph will eliminate the unnecessary removal from service and opening of plant systems and will, therefore, reduce the associated personnel radiation exposure.

The evaluation requirements of IWA-3100 (and, as referenced in IWA-3100, all of subarticle IWA-3000) are included as part of subarticle IWA-5250 and, therefore, will be considered as related requirements. Please note that no technical changes were made to the IWA-3000 section between 1989 Edition and the 1999 Addenda.

This request applies to the end of the current inservice inspection interval for each unit. BFN Unit 1 is in the first inservice inspection interval, which ends one year following restart of the unit. Unit 2 is in the third inservice inspection interval, which concludes on May 24, 2011. BFN Unit 3 is in the second inservice inspection interval, which ends November 18, 2005.

TVA requests approval of this request by March 1, 2005, to support future BFN testing.

There are no new regulatory commitments in this letter. If you have any questions, please contact me at (256) 729-2636.

Sincerely,

ORIGINAL SIGNED BY:

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cc: See Page 3

U.S. Nuclear Regulatory Commission

Page 3

December 7, 2004

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U.S. Nuclear Regulatory Commission
Page 4
December 7, 2004

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