July 31, 2006

Mr. Karl E. Singer
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 3 - REQUEST FOR ADDITIONAL INFORMATION REGARDING RELIEF REQUEST 3-ISI-2 ASSOCIATED WITH THE USE OF ASME CODE CASE-700 FOR THE THIRD INSERVICE INSPECTION INTERVAL (TAC NO. MC8786)

Dear Mr. Singer:

By letter to the Nuclear Regulatory Commission (NRC) dated October 19, 2005, Tennessee Valley Authority (TVA) submitted Relief Request 3-ISI-2 for Browns Ferry Nuclear Plant, Unit 3 from the inservice inspection requirements of the American Society of Mechanical Engineers *Boiler and Pressure Vessel Code*, Section XI, related to the examination and testing of snubbers. Instead, TVA proposes, pursuant to Title 10 of the *Code of Federal Regulations* Section 50.55a(a)(3)(i) to use the examination and testing plans currently defined in the Technical Requirements Manual.

Based on our review of your submittal, the NRC staff finds that a response to the enclosed request for additional information is needed before we can complete the review. This request was discussed with your staff on July 27, 2006, and it was agreed that a response would be provided by August 4, 2006.

If you have any questions, please contact me at (301) 415-2315.

Sincerely,

/RA/

Eva A. Brown, Project Manager
Plant Licensing Branch 2-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-296

Enclosure:
Request for Additional Information

cc w/encl: See next page

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Mr. Karl W. Singer
Tennessee Valley Authority
cc:

BROWNS FERRY NUCLEAR PLANT

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REQUEST FOR ADDITIONAL INFORMATION (RAI)

TENNESSEE VALLEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT UNIT 3

RELIEF REQUEST NO. 3-ISI-2

SNUBBERS INSPECTION AND TESTING FOR THE THIRD 10-YEAR INTERVAL

DOCKET NO. 50-296

TAC NO. MC8786

1. The licensee requested relief from the requirements of American Society of Mechanical Engineers (ASME) Section XI, IWF-5300(a) and (b) and IWF-5400 of Article IWF-5000. The Article IWF-5000 also contains requirements for snubber preservice examinations and tests in IWF-5200 and requirements for integral and nonintegral attachments for snubbers in IWF-5300(c). Explain whether and how the requirements of IWF-5200 and IWF-5300(c) will be met.

2. On page 140, the licensee requested relief in item (a) from Section IWF-5400 and ASME/American National Standards Institute (ANSI) requirements Operating Manual (OM)-1987, Part 4 with OMa-1988, Section 1.5.6 and 1.5.7. IWF-5400 states that:

> Snubbers installed, corrected or modified by repair/replacement activities shall be examined and tested in accordance with the applicable requirements of IWF-5200 prior to return to service.

Explain whether and how IWF-5200 requirements will be met.

3. On page 140, Basis for Relief, the licensee stated that the Plant Technical Requirement Manual (TRM), Section TR 3.7.4 is prepared in accordance with the guidance given by U.S. Nuclear Regulatory Commission (NRC) in Generic Letter (GL) 90-09. GL 90-09 only provides guidance for Snubber Visual Examination Intervals and Corrective Actions. GL-90-09 does not replace any other requirements of the OM Part 4, such as preservice examination (section 2.1), examination documentation (section 2.4), inservice operability testing (section 3.2), testing documentation (section 3.3), etc. Explain how these requirements are met in the proposed alternative.

4. a. On page 140, Alternative Examination, the licensee stated that TR 3.7.4 requirements will be utilized for the examination and testing of snubbers for preservice, inservice, and repair/replacement activities. The licensee never requested relief from IWF-5200 (see questions 1 and 2). Explain this discrepancy in the relief request.

   b. On page 140, Alternative Examination, the licensee referenced several procedures. The details of these procedures are not provided in the relief request. Explain and provide details whether and how these procedures are equivalent to or meet the requirements of Sections 2.4, 3.2, and 3.3 of OM Part 4.

Enclosure

5. On page 141, in the second paragraph, the licensee stated that visual examination of repaired and replaced snubbers will be performed in accordance with MPI-0-000-SNB004. Explain in detail how this examination is equivalent to the requirements of Sections 1.5.6 and 1.5.7 of OM Part 4.

6. On page 141, in the third paragraph, the licensee stated that snubber examination and testing data will be maintained in accordance with the requirements of TR 3.7.4, the site corrective action program, Standard Programs and Processes (SSP)-3.1, and the implementing procedures. Explain how TR 3.7.4 and the other specified documents meet OM Part 4, Section 3.3 requirements.

7. On page 141, Justification for the Granting of Relief, in the second paragraph, the licensee stated that the current program provides for a level of quality and safety equal to or greater than that provided by the OM and utilizes NRC guidance not incorporated into the OM Code. Provide a comparison between various sections of TR 3.7.4 and the OM Part 4 (e.g., sections 2.1, 2.4, 3.2 and 3.3) and explain how TR 3.7.4 provides a level of quality and safety equal to or greater than that provided by OM Part 4. Also, clarify and provide information regarding the statement ". . .utilizes guidance not incorporated in the OM Code referenced by the 2001 Edition, 2003 addenda of ASME Section XI."

8. On page 141, Justification for the Granting of Relief, in the second paragraph, the licensee stated that:

> Examination, testing, repair and replacement of snubbers is currently performed in accordance with TR 3.7.4, which utilizes the guidance provided by NRC in GL 90-09. The OM Code referenced by ASME Section XI has a different basis for examination (failure mode groups) and testing plans (10 percent, 37, or 55). It is impractical to implement both plans because of the resulting duplication of examination and testing. . . .

However, GL 90-09 only provides guidance for Snubber Visual Examination Intervals and Corrective Actions. GL 90-09 does not provide guidance for examination and testing plans. Explain how TR 3.7.4 meets the OM Part 4 Code requirement of examination and testing plans (10 percent, 37, or 55).

9. On page 141-142, Justification for the Granting of Relief, in the fourth paragraph, the licensee stated that replacement snubbers and snubbers which have repairs which might affect the functional test results are to be tested to ensure they meet the functional criteria. Explain how TR 3.7.4.6 meets the intent of Sections 1.5.6 and 1.5.7 of OM Part 4.

10. On page 142, Justification for the Granting of Relief, in the second paragraph, the licensee stated that the maintenance procedure provides visual examination criteria for installation of a snubber after repair or replacement. Provide details how the maintenance procedure visual examination requirements are equal to OM Part 4, Section 2.3.1.2 requirements.

11. On page 142, Justification for the Granting of Relief, in the third paragraph, the licensee stated that the training and documentation of personnel to the visual acceptance criteria, specified in the TRM implementing procedures provides an acceptable level of quality and safety. Justify this statement and explain how TRM implementing procedures visual training is equal to VT-3 training as required by the OM, Section IWA-2300.

12. On page 142, Justification for the Granting of Relief, in the fourth paragraph the licensee stated that:

> Because relief is sought from the ASME Section XI snubber examination and test requirements, there will be no ASME Section XI snubber examination and test activities to require Authorized Nuclear Inservice Inspector (ANII) involvement... A snubber program manager provides oversight of the TRM snubber program implementation for both visual examination and functional testing. The snubber program manager provides an acceptable level of quality and safety without ANII involvement in those activities.

Address the training as required by IWA-2300 or alternative method IWA-2317 conducted for the snubber program manager or the person performing snubber inspections.

13. On page 142, Justification for the Granting of Relief, in the fifth paragraph, the licensee stated that under the alternative requirements for snubbers, there will be no ASME Section XI inservice examination and testing to document in a summary report and that the TRM requirements are implemented by surveillance instructions. Justify how these specified surveillance instructions are equivalent to the Code requirements of Section IWA-6230 and OM-4, Section 2.3, and 3.3.

14. The TRM does not the address the requirements of OM Part 4, Section 2.3.4, Inservice Examination Failure Evaluation. Explain how this requirement is met.