

August 4, 2006

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 No. 50-260  
Tennessee Valley Authority )

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 2 - 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 REPAIR AND REPLACEMENT ACTIVITIES - RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION TAC NO. MC9287)**

By letter dated December 20, 2005, TVA requested NRC approval, pursuant to 10 CFR 50.55a(g) (4) (iv), to adopt a later edition of the ASME Section XI for BFN Unit 2. Specifically, TVA proposed to adopt the requirements for repair and replacement activities specified in the 2001 Edition, 2003 Addenda of the ASME Section XI Code, Subarticle IWA-4000 and all related requirements, as the code of record for the third ten-year inservice inspection interval for Unit 2.

Subsequent to TVA's submittal, the NRC staff informed TVA by letter dated June 28, 2006, that it was considering rulemaking that would require the nondestructive examination (NDE) provision in IWA-4540(a) (2) of the 2002 Addenda of Section XI to be applied when performing system leakage tests after repair and replacement activities performed by welding or brazing. This provision is not in the 2003 Addenda of ASME Section XI Code.

U.S. Nuclear Regulatory Commission  
Page 2  
August 4, 2006

Consequently, TVA is adding additional requirements to its request to adopt the 2001 Edition, 2003 Addenda of the ASME Section XI Code, Subarticle IWA-4000 and all related requirements, as the code of record for the third ten-year inservice inspection interval for repair/replacement activities for Unit 2. Subarticle IWA-4540(a) requires pressure testing (unless exempted by IWA-4540(b)) following repair and replacement activities performed by welding or brazing. IWA-4540(a) provides two options to satisfy the required pressure testing; a hydrostatic test, or a system leakage test. When BFN Unit 2 selects the option of performing the system leakage test to satisfy the IWA-4540(a) requirements, the additional requirements for the nondestructive examination method and acceptance criteria of the 1992 Edition or later of Section III shall be met prior to return to service of the component.

This request applies to the current BFN Unit 2 ASME Section XI, ten-year inservice inspection interval. BFN Unit 2 is in the third ten-year inservice inspection interval, which concludes on May 24, 2011.

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:

William D. Crouch  
Manager of Licensing  
and Industry Affairs

cc: See Page 3

U.S. Nuclear Regulatory Commission  
Page 3  
August 4, 2006

cc:

(Via NRC Electronic Distribution)  
Mr. Malcolm T. Widmann, Branch Chief  
U.S. Nuclear Regulatory Commission  
Region II  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW, Suite 23T85  
Atlanta, Georgia 30303-8931

NRC Resident Inspector  
Browns Ferry Nuclear Plant  
10833 Shaw Road  
Athens, Alabama 35611-6970

Ms. Eva A. Brown, Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
(MS 08G9)  
11555 Rockville Pike  
Rockville, Maryland 20852-2739

Ms. Margaret Chernoff, Project Manager  
U.S. Nuclear Regulatory Commission  
One White Flint, North  
(MS 08G9)  
11555 Rockville Pike  
Rockville, Maryland 20852-2739

U.S. Nuclear Regulatory Commission  
Page 4  
August 4, 2006

DTL:JWD:BAB

cc: B. M. Aukland, POB 2C-BFN  
M. Bajestani, NAB 1A-BFN  
A. S. Bhatnagar, LP 6A-C  
J. C. Fornicola, LP 6A-C  
R. G. Jones, POB 2C-BFN  
R. F. Marks, PAB 1C-BFN  
G. W. Morris, BR 4X-C  
B. J. O'Grady, PAB 1E-BFN  
K. W. Singer, LP 6A-C  
E. J. Vigluicci, ET 11A-K  
NSRB Support, LP 5M-C  
EDMS WT CA-K

s:\lic\Submit\subs\Unit 2 request to use subsequent edition for IWA-4150(b) RAI Response.doc