

In addition to the requirements of the 2001 Edition, 2003 Addenda of the ASME Section XI Code, Subarticle IWA-4000, BFN agrees with the NRC staff position, that when TVA selects the option of performing the system leakage test to satisfy the IWA-4540(a) requirements, the additional requirements for the NDE method and acceptance criteria of the 1992 Edition or later of ASME Section III shall be met prior to returning the equipment to service.

The ASME Section XI Code of record for the remainder of the BFN Unit 1 first ten-year inservice inspection interval is the 1995 Edition, 1996 addenda. BFN plans to complete all startup Repair and Replacement Activities using the 1995 Edition, 1996 addenda and proposes to implement this requested change following Unit 1 restart (i.e., breaker closure).

BFN Unit 2 was authorized by NRC letter dated November 16, 2006, to use the 2001 Edition, 2003 Addenda (with the above additional NDE requirements) of the ASME Section XI Code for Repair and Replacement activities, and BFN Unit 3 adopted the 2001 Edition, 2003 Addenda of ASME Section XI as the Code of record for the third ten-year inspection interval which began November 19, 2005. TVA's request will allow all three BFN units to use the same ASME requirements for Repair and Replacement activities.

This request applies to the remainder of the current BFN Unit 1 ten-year inservice inspection interval. BFN Unit 1 is in the first ten-year inservice inspection interval, which will conclude one year following Unit 1 restart.

This request is consistent with the guidance provided in NRC Regulatory Issue Summaries 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," and 2004-16, "Use of Later Editions and Addenda to ASME Code Section XI for Repair and Replacement Activities."

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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
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