

R08070111717

January 11, 2007

10 CFR 50.55a(g)(4)(iv)

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. 50-259  
Tennessee Valley Authority )

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 1 - AMERICAN SOCIETY  
OF MECHANICAL ENGINEERS (ASME) SECTION XI, INSERVICE INSPECTION  
(ISI) PROGRAM, FIRST TEN-YEAR INSPECTION INTERVAL - REQUEST TO  
USE SUBSEQUENT EDITION AND ADDENDA OF ASME SECTION XI CODE FOR  
REPAIR AND REPLACEMENT ACTIVITIES**

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 Codes, which have been incorporated by reference in paragraph (b) of that section, for inservice examination of components and system pressure tests. Also, subarticle IWA-4150(b) of the ASME Section XI Code allows use of later editions and addenda when the later editions and addenda have been accepted by the enforcement and regulatory authorities having jurisdiction at the plant site.

In accordance with the provisions of 10 CFR 50.55a(g)(4)(iv), and ASME Section XI, IWA-4150(b), TVA is seeking 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, for BFN Unit 1. Certain restrictions contained in 10 CFR 50.55a that apply to the 2001 Edition through the 2003 Addenda of the ASME Section XI Code, specific to Article IWA-4000, will remain in effect.

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  
Manager of Licensing  
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