

April 22, 2008

10 CFR 50.55a

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, AND ASME OPERATION AND
MAINTENANCE (OM) CODE - REQUEST TO USE SUBSEQUENT EDITION
OF CODES**

In accordance with 10 CFR 50.55a paragraphs (f)(4)(iv) and (g)(4)(iv), as clarified in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," TVA hereby requests NRC approval to use portions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI and ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) authorized in 10 CFR 50.55a(b) for the Browns Ferry Units 1, 2, and 3 Inservice Testing (IST) Program.

TVA proposes to eliminate IST activities as a duty of the Authorized Inspection Agency and Inspectors (AIAI) at BFN Units 1, 2, and 3 by adopting portions of the 2001 Edition through 2003 Addenda of the ASME OM Code for Units 1, 2, and 3 related IST duties, qualifications, and access provisions of the AIAI. Also, TVA requests approval to use portions of

the 2001 Edition through 2003 Addenda of ASME Section XI for
Unit 2 IST related duties of the AIAI.

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The enclosure to this letter provides specific information regarding TVA's request. 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:

D. T. Langley
Manager of Licensing
and Industry Affairs

cc: See Page 3

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Enclosure

cc(Enclosure):

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JWD:JEE:BAB

Enclosure

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ENCLOSURE

**TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3
AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME)
OPERATIONS AND MAINTENANCE (OM) CODE AND,
BFN UNIT 2
AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI,
INSERVICE INSPECTION (ISI) PROGRAM,

REQUEST TO USE SUBSEQUENT EDITION OF CODES OF RECORD
FOR INSERVICE TESTING (IST) PROGRAM**

In accordance with 10 CFR 50.55a paragraphs (f)(4)(iv) and (g)(4)(iv), TVA hereby requests NRC approval to use portions of a later edition and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI and ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) authorized in 10 CFR 50.55a(b) for the BFN Units 1, 2, and 3 Inservice Testing (IST) Program.

ASME Code Components Affected

This request affects all components within the scope of the BFN Units 1, 2, and 3 IST Program.

Applicable Code Edition and Addenda

The current Code of record for the BFN Units 1, 2, and 3 IST Program is the 1995 Edition and 1996 Addenda of the ASME OM Code. The current Code of record for the BFN Unit 2 Inservice Inspection (ISI) Program is the 1995 Edition through 1996 Addenda of ASME Section XI. The current Code of record for the BFN Units 1 and 3 ISI Program is the 2001 Edition through 2003 Addenda of ASME Section XI.

The 1995 Edition through 1996 Addenda of the ASME OM Code provides requirements for the duties, qualifications, and access provisions of the Authorized Inspection Agency and Inspectors (AIAI). In addition, the 1995 Edition through 1996 Addenda of ASME Section XI (applicable to the BFN Unit 2 ISI Program), subparagraph IWA-2110 specifies duties of the AIAI to verify inservice tests required on pumps and valves (IWP and IWV) have been completed and the results recorded (IST activities). The requirement for the AIAI

to verify IST activities does not exist in subparagraph IWA-2110 of the 2001 Edition through 2003 Addenda of ASME Section XI (applicable to BFN Units 1 and 3 ISI Program).

Proposed Subsequent Code Edition and Addenda (or Portion)

TVA proposes to eliminate IST activities as a duty of the AIAI at BFN Units 1, 2, and 3 by adopting portions of the 2001 Edition through 2003 Addenda of the ASME OM Code for Units 1, 2, and 3 related IST duties, qualifications, and access provisions of the AIAI. Also, TVA requests approval to use portions of the 2001 Edition through 2003 Addenda of ASME Section XI for Unit 2 IST related duties of the AIAI.

Specifically, the 2001 Edition through 2003 Addenda of ASME Section XI (Unit 2) and ASME OM Code (Units 1, 2, and 3) do not require IST as a duty of the AIAI. All requirements for the duties, qualifications, and access provisions of the AIAI were removed from the ASME OM Code beginning with the 1998 Edition and carry through the 2001 Edition through 2003 Addenda of ASME Section XI. All requirements related to IST duties for AIAI were removed from ASME Section XI beginning 1999 Addenda to the 1998 Edition and carry through the 2001 Edition through 2003 Addenda of ASME Section XI.

Related Requirements

10 CFR 50.55a(f) (4) (iv) states:

"Inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

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

"Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met."

Limitations and Modifications:

10 CFR 50.55a(b) (2) incorporates by reference the ASME Boiler and Pressure Vessel Code, Section XI, and includes the 1970 Edition through the 1976 Winter Addenda, and the 1977 Edition (Division 1) through the 2003 Addenda (Division 1), subject to limitations and modifications.

10 CFR 50.55a(b) (3) incorporates by reference the ASME Code for Operation and Maintenance of Nuclear Power Plants and includes the 1995 Edition through the 2003 Addenda, subject to limitations and modifications.

There are no limitations or modifications related to AIAI duties, qualifications, and access provisions in 10 CFR 50.55a(b) (2) and 10 CFR 50.55a(b) (3).

Basis for Using Subsequent Code Editions and Addenda

ASME Section XI, 2001 Edition through 2003 Addenda has been incorporated by reference in 10 CFR 50.55a(b) (2).

ASME OM Code 2001 Edition through the 2003 Addenda has been incorporated by reference in 10 CFR 50.55a(b) (3).

Duration of Proposed Request

This request is proposed for the duration of BFN's third inservice testing interval, which is scheduled to end on August 31, 2012, for Units 1, 2, and 3.