



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

July 2, 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 )  
Tennessee Valley Authority )

Docket No. 50-391

**WATTS BAR NUCLEAR PLANT (WBN) UNIT 2 - REQUEST TO USE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE, CODE CASE N-520-2, "ALTERNATIVE RULES FOR RENEWAL OF ACTIVE OR EXPIRED N-TYPE CERTIFICATES FOR PLANTS NOT IN ACTIVE CONSTRUCTION, SECTION III, DIVISION 1" - RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (TAC NO. MD8314)**

- References:
1. NRC letter dated May 22, 2008, "Watts Bar Nuclear Plant, Unit 2 – Request for Additional Information Regarding Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction (TAC NO. MD8314)"
  2. TVA letter dated February 1, 2008, "Watts Bar Nuclear Plant (WBN) Unit 2 – Request to Use American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Code Case N-520-2, "Alternative Rules for Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction, Section III, Division 1"

The purpose of this letter is to respond to the NRC request for additional information (Reference 1) regarding the use of provisions of ASME Section III Code Case N-520-2, "Alternative Rules for Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction." Code Case N-520-2 would allow TVA to obtain a temporary Certificate of Authorization from ASME to complete and transfer documentation of the partially completed ASME Section III systems and components to the jurisdiction of a subcontractor, who will be an ASME Section III N-Certificate holder. TVA's original request for approval to use the Code Case was submitted on February 1, 2008 (Reference 2).

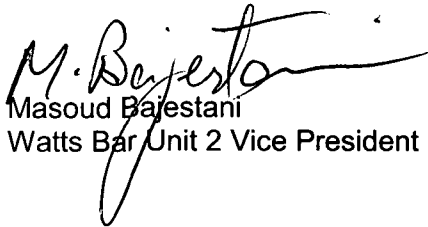
Enclosure 1 provides the NRC requests and TVA's responses.

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If you have any questions in this matter, please contact Gordon Arent, Manager of Watts Bar Unit 2 Nuclear Licensing and Industry Affairs at (423) 365-2004.

Sincerely,



Masoud Bajestani  
Watts Bar Unit 2 Vice President

Enclosure

cc (Enclosure):

Lakshminarasimh Raghavan  
U.S. Nuclear Regulatory Commission  
MS 08H4A  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

Patrick D. Milano, Senior Project Manager, Watts Bar Special Projects Branch  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

Loren R. Plisco, Deputy Regional Administrator for Construction  
U. S. Nuclear Regulatory Commission  
Region II  
Sam Nunn Atlanta Federal Center, Suite 23T85  
61 Forsyth Street, SW,  
Atlanta, Georgia 30303-8931

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 Unit 2  
Watts Bar Nuclear Plant  
1260 Nuclear Plant Road  
Spring City, Tennessee 37381

Enclosure 1  
Response to Request for Additional Information  
ASME Code Case N-520-2

**NRC request 1:**

*In paragraph (c) of the ASME Code Case N-520-2 it is stated that: "[t]he Quality Assurance program previously accepted by the society shall be continually implemented (NCA-8140) and any revisions to the program shall be acceptable to the Authorized Nuclear Inspection Agency." However in the second paragraph of page 1 of Enclosure 1 to the application, it notes that the ASME Section III Quality Assurance (QA) Manual was applied to WBN-2 only through October 25, 1996. It appears that the code case requires that the ASME Section III QA manual should have been applied post October 25, 1996, to such items as layup, maintenance, and removal of components for use on the other unit.*

*Clarify whether the QA manual was applied after October 25, 1996, for such items as layup, maintenance and removal of components.*

**TVA response:**

TVA's Nuclear Quality Assurance Plan (NQAP) (TVA-NQA-PLN89-A) defines and describes the nuclear quality assurance (QA) requirements for TVA and establishes the responsibilities for their implementation. The NQAP has been continuously applied to WBN Unit 2. Among other things, that plan applied to items such as layup, maintenance, and removal of components for use on WBN Unit 1. Changes to the NQAP comply with the requirements for approval and submittal of 10 CFR 50.55 (f) (3) (construction permits) for WBN Unit 2 and with 10 CFR 50.54 for the operating units. The current revision of the NQAP was submitted December 4, 2007 (Reference 1).

Associated with the NQAP is the TVA ASME Section III Quality Assurance Manual (ASME III QAM). The ASME III QAM is a self-contained manual that describes specific QA requirements for the control of items and activities subject to the ASME Section III. Revisions to the ASME III QAM are coordinated with the Authorized Inspection Agency for review and acceptance prior to implementation.

As discussed in Reference 2, the ASME III QAM was revised on October 25, 1996, to reflect the fact that WBN Unit 1 was completed and that there was, at the time, no current plan for completing WBN Unit 2. ASME Section III activities associated with the design, construction, and installation of ASME III systems and components in WBN Unit 2 were no longer being performed. TVA allowed the Owner's Certificate and the N-type Certifications to expire, and the issued Code Symbol Stamps were returned to the Society.

On March 10, 2008, the ASME III QAM was revised (Revision 32) to comply with the provisions of ASME Section III Code Case N-520-2 and specifically N-520-2 (f)(4) with respect to the QA Program. This revision was coordinated with and accepted by the Authorized Inspection Agency.

Enclosure 1  
Response to Request for Additional Information  
ASME Code Case N-520-2

**NRC request 2:**

*In Enclosure 1, the section entitled "Proposed Alternative and Basis for Use" states in Item No. 2 that "[t]he Society will perform a survey of the limited scope quality assurance program and processes to ensure that the procedures are in place to accomplish the code data transfer in accordance with the provisions of the Code Case".*

*Since NRC staff has not yet reviewed this revised code case, nor has it approved its generic use by the industry through the usual processes of incorporation (i.e., Regulatory Guides, Title 10 of the Code of Federal Regulations, Section 50.55a), the staff's position is that a FULL ASME survey, and not a limited survey, should be performed.*

*Clarify your definition of a "limited scope survey" to provide, in more detail, the scope of the survey of the QA program to be performed.*

**TVA response:**

The survey will be a full survey of the ASME program invoked by TVA's limited scope QA program. TVA's ASME III QAM is limited in scope in that no ASME Code activities other than completion of documentation, Code Data Reports, and Stamping are allowed under the provisions of ASME Section III Code Case N-520-2. The current TVA ASME III QAM meets the requirements of ASME Section III Code Case N-520-2. Under the provisions of Code Case, WBN Unit 2 will complete documentation and Code Data Reports and Stamping for those portions of the plant that are suitable for use. In addition, WBN Unit 2 project will identify those items that are not complete to the Authorized Inspection Agency and the N-Certificate Holder having overall responsibility for completion of construction and installation of ASME III systems and components in WBN Unit 2.

**NRC request 3:**

*In Enclosure 1, Item No. 6 of the section entitled "Proposed Alternative and Basis for Use" states that the term length of the temporary certificates will be of limited duration. Paragraph (f)(7) of the code case has specific requirements for the term of the temporary certificates and for renewals.*

*Clarify your definition of "limited duration" to a more detailed timeframe, and describe how this will comply with requirements of the code case.*

**TVA response:**

Code Case N-520-2 allows use of the temporary certificates for one year with allowance for one extension for an additional period not to exceed one year. TVA will comply with the requirements of the Code Case.

Enclosure 1  
Response to Request for Additional Information  
ASME Code Case N-520-2

References:

1. TVA letter dated December 4, 2007, "TVA Nuclear Quality Assurance (NQA) Plan (TVA-NQA-PLN89-A) - Browns Ferry, Sequoyah and Watts Bar nuclear Plants - Update"
2. TVA letter dated February 1, 2008, "Watts Bar Nuclear Plant (WBN) Unit 2 – Request to Use American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Code Case N-520-2, "Alternative Rules for Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction, Section III, Division 1"