



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

October 11, 2010

10 CFR 50.55a

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Watts Bar Nuclear Plant, Unit 2
NRC Docket No. 50-391

Subject: **Watts Bar Nuclear Plant (WBN) Unit 2 - Transition from American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section III Division I to Section XI**

- References:
1. TVA letter to NRC, "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,'" dated February 1, 2008
 2. NRC letter to TVA, "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)," dated May 22, 2008
 3. NRC letter to TVA, "Watts Bar Nuclear Plant, Unit 2 - Request for Relief Regarding Alternative Rules for Renewal of Active or Expired N-Type Certificates (TAC No. MD8314)," dated September 29, 2010
 4. TVA letter to NRC, "Watts Bar Nuclear Plant (WBN) Unit 1 - Completion of Construction Activities and Submittal of the ASME N-3 Code Data Reports," dated December 8, 1995

The purpose of this submittal is to describe the planned WBN Unit 2 transition from ASME Boiler and Pressure Vessel Code Section III Division 1 to Section XI.

WBN Unit 2 is completing installation, nondestructive examination, inspection, and hydrostatic testing, N-5 Code Data Reports, and N-Stamping of ASME piping systems per ASME Division 1 Section III 1971 Edition through Summer 1973 Addenda and Code Case N-520-2 (References 1, 2, and 3).

Upon completion of system N-Stamping, the ASME Section III Owner, TVA Nuclear Generation Development and Construction (NGDC), will transfer jurisdiction of the ASME Section III Code piping system to TVA Nuclear Power Group (NPG), for control under their ASME Section XI Program, QA Program, TVA-NQA-PLN89-A, and related procedures.

Transfer of a system will occur upon verification that there are no remaining ASME Section III activities on a given system, the N-5 Data Report has been completed, and the N-Stamp(s) applied. All subsequent repair and replacement activities will be performed using the TVA NPG and WBN Unit 1 ASME Section XI Repair and Replacement Program procedures which comply with ASME Section XI 2001 Edition through 2003 Addenda. Refer to Interpretation III-1-83-61 in Enclosure 1. The Unit 2 ASME Section III N-3 Data Report for the entirety of Unit 2 Section III systems will be completed and submitted after all ASME Section III systems have been completed.

TVA's programmatic implementing procedures for these Section XI requirements are SPP-9.1, "ASME Section XI," and TI-100.014, "ASME Section XI Repairs and replacements." The ASME Section XI repair and replacement program has been used for WBN Unit 1 since TVA WBN Unit 1 issued the ASME N-3 Code Data Reports on December 8, 1995, per Reference 4. Repairs and replacements shall be performed and documented in accordance with the ASME Boiler and Pressure Vessel Code Section XI, Division 1, 2001 Edition through 2003 Addenda, Article IWX-4000, for the Repair and Replacement of Class 1, 2, and 3 and Class MC components.

This process will allow timely completion of ASME Section III activities on WBN Unit 2 support systems such as Essential Raw Cooling Water, Component Cooling Water, Service Air, and Spent Fuel Pool Cooling and Cleanup. These systems are currently governed by both ASME Section III (Unit 2 only portion) and ASME Section XI (Unit 1 and common portion) for modification, repair, and replacement and controlled by both TVA NGDC WBN Unit 2 and TVA NPG WBN Unit 1. Further, these support systems will be operated to support preoperational testing and turnover of other Unit 2 systems. Following transfer of the Unit 2 portion of the system, all subsequent repair and replacement will be performed under the Unit 1 Section XI program.

The ASME Section XI Repair and Replacement program is currently being used to control modification, refurbishment, and repair of Unit 2 components that were installed under ASME Section III, and transitioned to ASME Section XI per Reference 4, but were not required for WBN Unit 1 operation.

ASME Section XI Repair and replacement shall be documented on Form NIS-2 and NIS-2A per IWA-6230, IWA-6240, or Code Case N-532-4. An Owners Summary Report shall be issued within 90 days following Unit 2 commercial operation for those repairs or replacements, if any, which were performed under Section XI on Unit 2 prior to commercial operation.

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The WBN Unit 2 Repair and Replacement Program Code of Record for WBN Unit 2 will be revised to conform with the ASME Section XI Code of Record for the first WBN Unit 2 Inservice Inspection Program 10-year Inspection Interval.

Enclosure 2 identifies those actions committed to by TVA in this letter. If you have any questions, please contact William Crouch at (423) 365-2004.

Sincerely,


Masoud Bajestani
Watts Bar Unit 2 Vice President

Enclosures:

1. Code Interpretations
2. List of Regulatory Commitments

cc (Enclosures):

U. S. Nuclear Regulatory Commission
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NRC Resident Inspector Unit 2
Watts Bar Nuclear Plant
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Enclosure 1

Code Interpretations

Interpretation: III-1-83-61

Subject: Jurisdiction of Section III, Division 1 and Section XI
Requirements When Performing Repairs or Modifications
Subsequent to N-Stamping, IWA-4000

Date Issued: January 26, 1983

File: BC82-277

Question (1): Do the rules of Section III or Section XI apply to the repair or modification of a component, manufactured to Section III requirements, subsequent to its being N-Stamped but prior to the filing of the Form N-3 by the Owner?

Reply (1): The rules of either Section III or Section XI as determined by the Owner may be applied to the repair or modification of an N-Stamped component subsequent to stamping but prior to the filing of the Form N-3 by the Owner, or prior to start of plant operation where no N-3 Form has been filed.

Question (2): Who is authorized to perform these repairs or modifications?

Reply (2): For repairs performed to the rules of Section XI, the Owner or the Owner's designee may perform the repair or modification, provided the appropriate requirements of Section XI are met. When the use of Section III rules are selected as the basis for repairs or modification, only organizations holding appropriate Certificates of Authorization may certify that the work meets the requirements of Section III.

Enclosure 2

List of Regulatory Commitments

Tennessee Valley Authority
Watts Bar Nuclear Plant - Unit 2, Docket No. 50-391

Commitment	Committed Date
An Owners Summary Report shall be issued within 90 days following Unit 2 commercial operation for those repairs or replacements, if any, which were performed under Section XI on Unit 2 prior to commercial operation.	90 days following Unit 2 commercial operation