UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 15, 2010

Mr. R. M. Krich
Vice President, Nuclear Licensing
Tennessee Valley Authority
3R Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNIT 2 — REQUEST FOR ADDITIONAL INFORMATION REGARDING RELIEF REQUEST NO. 2-ISI-40 SNUBBERS INSPECTION AND TESTING FOR FOURTH 10-YEAR INTERVAL (TAC NO. ME3716)

Dear Mr. Krich:

By letter dated March 31, 2010, Tennessee Valley Authority submitted a request for relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, related to the examination and testing of snubbers (Agencywide Documents Access and Management System Accession No. ML100920542, Attachment 7). The request supports the fourth 10-year inservice inspection interval for Browns Ferry Nuclear Plant, Unit 2.

Based on our review of your submittal, the U. S. Nuclear Regulatory Commission staff finds that a response to the enclosed request for additional information is needed before we can complete the review.

This request was discussed during a teleconference with members of your staff on December 14, 2010, and it was agreed that a response would be provided within 45 days of this teleconference.

If you have any questions, please contact me at (301) 415-1055.

Sincerely,

Christopher Gratton, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-260

Enclosure: Request for Additional Information

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

TENNESSEE VALLEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT UNIT 2

RELIEF REQUEST NO. 2-ISI-40

SNUBBERS INSPECTION AND TESTING FOR FOURTH 10-YEAR INTERVAL

DOCKET NO. 50-260

TAC NO. ME3716

Reference: Letter from R. M. Krich, Tennessee Valley Authority to the Nuclear Regulatory Commission (NRC) related to the Browns Ferry Nuclear Plant (BFN), Unit 2, titled "American Society of Mechanical Engineers [ASME] Boiler and Pressure Vessel Code [Code], Section XI, Inservice Inspection [ISI] Program for the Fourth Ten-Year Inspection Interval," dated March 31, 2010.

1. Page 123 of 205, under "BASIS FOR RELIEF," states, in part, that, "The TRM [Technical Requirements Manual], TR 3.7.4 is prepared in accordance with the guidance given by the Nuclear Regulatory Commission in Generic Letter (GL) 90-09, 'Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions'." GL 90-09 only provides guidance for snubber visual examination intervals and corrective actions. Please confirm that all others snubber preservice and inservice visual examination and tests requirements of the ASME/American National Standards Institute (ANSI) Code for Operation and Maintenance of Nuclear Power Plants, Part 4 (OM-4), 1987 Edition through the 1988 Addenda, will be met by the proposed alternative.

2. On page 123 of 205, under "ALTERNATIVE EXAMINATION," the first paragraph states, in part, that, "The BFN Technical Requirements Manual (TRM), TR 3.7.4, requirements will be utilized for the examination and testing of snubbers for preservice, inservice, and repairs/replacement activities." On page 124 of 205, "ALTERNATIVE EXAMINATION," the last paragraph states, in part, that, "In lieu of requirements of IWF-5200(a) and (b), the examination and testing requirements will be met by the TRM Snubber Program." The ASME Code, Section XI, IWF-5200(a) and (b) provide preservice examination and testing requirements of snubbers and IWF-5300(a) and (b) provide inservice examination and testing requirements of snubbers. Please explain how the requirements of IWF-5300(a) and (b) will be met at BFN Unit 2.

3. On Page 124 of 205, under "JUSTIFICATION FOR THE GRANTING OF RELIEF," the first paragraph states, "The current program, as defined by TR 3.7.4 provides for a level of quality and safety equal to or greater than that provided by the ASME/ANSI OM part 4 ASME Section XI Code 1995 Edition, 1996 Addenda requirements."

   (a) Please explain how TR 3.7.4 provides a level of quality and safety equal to or greater than that provided by OM-4, 1987 Edition through the 1988 Addenda.

   (b) Please clarify and provide the basis for the use of ASME Code, Section XI, 1995 Edition, 1996 Addenda requirements, since the code of record for BFN 2 is the ASME Code, Section XI, 2004 Edition (Note: ASME Code Section XI, 2004 Edition, Table IWA-1600-1 requires that the ASME/ANSI OM-4 must be the 1987 Edition through the 1988 Addenda).

4. On page 125 of 205, the sixth paragraph states, in part, that, "Personnel performing the TRM required visual examinations are 'process qualified' to perform the examinations and testing as required by the TRM and implemented by referenced procedures." IWF-5200(a) and IWF-5300(a) requires that preservice and inservice examination shall be performed using the VT-3 visual examination method as described in IWA-2213. Please explain how "process qualified" personnel training is equivalent to the required VT-3 visual examination method as described in IWA-2213.

5. Pages 127 and 128 of 205, list Attachments A through K for this submittal, but only Attachment K is included in the submittal. Please explain why Attachments A through J are not included in the submittal.

6. The proposed alternative does not address the requirements of OM-4, Section 2.3.4.3, "Examination Failure Mode Groups," and Section 3.2.4.2, "Test Failure Mode Groups," related to inservice examination and functional testing of snubbers. Please explain how the proposed alternative meets these requirements.

7. The applicable code for the BFN Unit 2 ISI program is the ASME Code, Section XI, 2004 Edition. The ASME Code, Section XI, 2004 Edition, Paragraph IWA-6230, "Summary Report Preparation," requires an inservice inspections summary report to be prepared at the completion of the inservice inspection conducted during a refueling outage. Please explain how the proposed alternative meets this requirement.

December 15, 2010

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Sincerely,
/RA/
Christopher Gratton, Senior Project Manager
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