



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

August 7, 2012

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 - REQUEST TO USE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE, CODE CASES N-520-4 and N-520-5, "ALTERNATIVE RULES FOR RENEWAL OF ACTIVE OR EXPIRED N-TYPE CERTIFICATES FOR PLANTS NOT IN ACTIVE CONSTRUCTION, SECTION III, DIVISION 1"

- References:
1. 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 (TAC No. MD8314)'"
 2. 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)"
 3. TVA letter dated July 2, 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' - Response to Request for Additional Information (TAC No. MD8314)"
 4. NRC letter dated October 2, 2008, "Watts Bar Nuclear Plant, Unit 2 - Request for Relief Regarding Alternative Rules for Renewal of Active or Expired N-Type Certificates (TAC No. MD8314)"

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5. TVA letter dated June 25, 2010, "Watts Bar Nuclear Plant (WBN) Unit 2 - Request to Use American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Code Case N-520-3, 'Alternative Rules for Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction, Section III, Division 1' - (TAC No. MD8314)"
6. NRC letter dated September 29, 2010, "Watts Bar Nuclear Plant, Unit 2 - Request for Relief Regarding Alternative Rules for Renewal of Active or Expired N-Type Certificates (TAC No. MD8314)"

Pursuant to 10 CFR 50.55a(a)(3)(i), TVA requests approval for the use of the provisions of approved ASME Code Cases N-520-4 and N-520-5, "Alternative Rules for Renewal of Active or Expired N-type Certificates for Plants Not in Active Construction, Section III, Division 1." The attached Code Case N-520-5 (which includes the changes from Code Case N-520-4) is an advance copy from ASME and will be issued in Supplement 10 to the 2010 ASME Edition Code Cases. These Code Cases will be applied for specific use as part of the construction activities associated with the ASME Section III Division 1 systems and components in WBN Unit 2.

Following original construction of WBN Unit 2, TVA allowed their ASME N-Type Certificates to expire. Code Case N-520 provides a process whereby expired Certificate Holders can obtain a temporary Certificate for the purpose of transferring the responsibility for completing a plant to a new Certificate Holder. The holder of the new temporary Certificate is referred to as either the temporary Certificate Holder or expired Certificate Holder. The ASME activities such as procurement and fabrication were performed during original construction under the N-Type Certificates which were active at that time. No new ASME Code work is being performed under the N-520 temporary Certificates.

The NRC staff authorized, pursuant to 10 CFR 50.55a(a)(3)(i), a temporary Certificate of Authorization to TVA for use of the alternatives in Code Case N-520-3 to conduct the transfer of N-type certificates at WBN Unit 2 (References 1 through 6). The use of this Code Case was authorized until such time as the Code Case is published in a future version of Regulatory Guide (RG) 1.84 and incorporated by reference in 10 CFR 50.55a(b). As a condition, TVA must comply with the duration and terms of the temporary certificates and for renewals as delineated in the Code Case.

Code Case N-520-2 authorized a single one-year extension of the temporary Certificate of Authorization. Code Case N-520-3 authorized two one-year extensions of the temporary Certificate of Authorization. Code Case N-520-4 is an administrative revision approved by ASME to separate and clarify the requirements for active Certificate Holders versus expired Certificate Holders. This revision added headings, repeated a requirement for active Certificate Holders, and renumbered the paragraphs for expired Certificate Holders. Since there was no change to the requirements for expired Certificate Holders (which is the process for WBN Unit 2), TVA has not previously submitted a Relief Request for N-520-4 for WBN Unit 2.

Code Case N-520-5 provides explicit authorization for a process for partially installed material and supporting documentation to be transferred from the expired Certificate Holder to the new Certificate Holder. The process will be used for instrument and sample line material which was partially installed (i.e., cut and bent as required) but not welded into place. The partially installed material was stored in place in its intended final location and configuration.

Enclosure 1 provides TVA's request for relief to use the proposed alternative Code Cases N-520-4 and N-520-5. ASME Section III construction, fabrication, and installation activities on WBN Unit 2 are in progress with contractors who have the appropriate Code Symbol Stamps to complete the construction of WBN Unit 2. NRC approval is required by November 2012 in order to support the current schedule. Enclosure 2 contains a copy of Code Case N-520-5. Therefore, there are no new regulatory commitments made in this letter.

If you have any questions in this matter, please contact Gordon Arent at (423) 365-2004.

Sincerely,



Raymond A. Hruby, Jr.
General Manager, Technical Services
Watts Bar Unit 2

Enclosures:

1. Watts Bar Nuclear Plant (WBN) Unit 2 - Request for Relief to Use American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Code Cases N-520-4 and N-520-5, "Alternative Rules for Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction, Section III, Division 1"
2. Code Case N-520-5, "Alternative Rules for Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction, Section III, Division 1"

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cc (Enclosures):

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ENCLOSURE 1

WATTS BAR NUCLEAR PLANT (WBN) UNIT 2 - REQUEST FOR RELIEF TO USE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE, CODE CASES N-520-4 AND N-520-5, "ALTERNATIVE RULES FOR RENEWAL OF ACTIVE OR EXPIRED N-TYPE CERTIFICATES FOR PLANTS NOT IN ACTIVE CONSTRUCTION, SECTION III, DIVISION 1"

Executive Summary:

Pursuant to 10 CFR 50.55a(a)(3)(i), TVA is requesting approval to use the provisions of ASME Code Cases N-520-4 and N-520-5, "Alternative Rules for Renewal of Active or Expired N-type Certificates for Plants Not in Active Construction, Section III, Division 1." In July 2012, Code Case N-520-5 was approved by ASME. The attached Code Case N-520-5 (which includes the changes from previous ASME approved Code Case N-520-4) is an advance copy from ASME and will be issued in Supplement 10 to the 2010 ASME Edition Code Cases. These Code Cases will be applied for specific use as part of the construction activities associated with the completion of ASME Section III systems and components in WBN Unit 2.

Following original construction of WBN Unit 2, TVA allowed their ASME N-Type Certificates to expire. Code Case N-520 provides a process whereby expired Certificate Holders can obtain a temporary Certificate for the purpose of transferring the responsibility for completing a plant to a new Certificate Holder. The holder of the new temporary Certificate is referred to as either the temporary Certificate Holder or expired Certificate Holder. The ASME activities such as procurement and fabrication were performed during original construction under the N-Type Certificates which were active at that time. No new ASME Code work is being performed under the N-520 temporary Certificates.

Code Case N-520-4 is an administrative change which separates the requirements for active Certificate Holders versus expired Certificate Holders. This Code Case revision did not affect the technical requirements for expired Certificate Holders such as WBN Unit 2 but did affect the overall format (i.e., paragraph numbering) of the sections for expired Certificate Holders. Since Code Case N-520-4 is administrative in nature only and does not affect the technical requirements applicable to WBN Unit 2, no further justification will be provided.

Code Case N-520-5 provides explicit authorization for a process for partially installed material and supporting documentation to be transferred from the expired Certificate Holder to the new Certificate Holder. This Code Case revision was developed since it was not clear whether Code Case N-520-3 addressed transfer of partially installed material and supporting documentation to a new Certificate Holder. The process will be used for instrument and sample line materials that were procured and partially installed but not welded by TVA, the Owner and expired/temporary Certificate Holder. The incorporation of Code Case N-520-5 will allow TVA to document partial installation of materials and a new Certificate Holder to complete the installation.

I. Systems and Components Affected

This request will be applicable to the WBN Unit 2 safety-related systems and components required to be designed, fabricated, and constructed in compliance with the rules of the ASME Boiler and Pressure Vessel Code, Section III.

Specifically, Code Case N-520-5 addresses ASME Section III Division 1 Code material (e.g., pipe, elbows, tees, etc.) that were purchased by the expired Certificate Holder and partially installed. The materials may have been cut, bent, dry fit, partially welded, and supported using engineering details and procedures.

II. Applicable ASME Code Edition and Addenda

WBN Unit 2 ASME piping systems and components were designed and constructed to meet the 1971 Edition with addenda through the Summer 1973 Addenda (1971S73) of Section III Division 1, as the construction Code-of-Record. TVA's ASME Section III Division 1 Quality Assurance Manual, in effect at the time Unit 2 construction activities were suspended, was written to meet the administrative, documentation, and quality control program aspects delineated in the 1980 Edition through the Winter 1981 Addenda (1980W81). TVA's program, processes, and procedures to document the partially completed piping systems presently reflect these requirements including Code Case N-520-3.

Code Case N-520-3, "Alternative Rules for Renewal of N-type Certificates for Plants Not in Active Construction, Section III, Division 1," and Non-mandatory Appendix Z to ASME Section III were adopted to allow TVA to renew 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. This will allow the subcontractor to complete the construction of the WBN Unit 2 systems and complete the associated N-5 Code Data Reports to certify that the systems were constructed in accordance with ASME Section III, and will further allow TVA to document completion of Unit 2 as part of the Owner's Section III required responsibilities at the time that construction is finished.

TVA's program, processes, and procedures to document the partially completed piping systems, transfer jurisdiction to an N Certificate Holder with overall responsibility to complete construction and N-5 Code Data Reports, and document completion of WBN Unit 2 construction activities presently reflect these requirements.

III. Code Requirement

At the time of the suspension of construction activities at WBN Unit 2, TVA was the N, NA, and NPT Certificate Holder for the unit. In addition, there were no clear directions in ASME Section III Division 1 regarding transfer of jurisdiction for Code activities from the expired Certificate Holder of an incomplete unit to a new Certificate Holder. The wording in ASME Section III Division 1 required these activities to be administered and controlled by N-type Certificate Holders. Apart from the earlier editions and addenda, it was recognized that circumstances may occur where construction was interrupted prior to the completion of all Code assigned responsibilities, then resumed under a different N-type Certificate Holder. To address this possibility, the ASME Section III Division 1 Committee created Code Case N-520, "Alternative Rules for Renewal of N-type Certificates for Plants Not in Active Construction, Section III, Division 1." Later, the non-mandatory Appendix Z to ASME Section III was also created to incorporate the provision of the Code Case. ASME Code Case N-520 was created, approved, and published effective December 9, 1993.

Revision 1 to N-520 was approved and published effective October 24, 1994. Appendix Z was created and approved as part of the 2004 Edition of Section III, which was published in July 1, 2004. Revision 2 to N-520 was approved and published by Supplement 4 to the 2007

ASME Edition of Section III Code Cases effective November 1, 2007. Revision 3 to Code Case N-520 was approved by Supplement 11 to the 2007 ASME Edition of Section III Code Cases effective November 11, 2009. Code Case N-520-4 was approved previously by ASME but has not previously been published in a Supplement to the ASME Code Cases.

Since resuming WBN Unit 2 construction completion under Code Cases N-520-2 and N-520-3, TVA has prepared the expired/temporary Certificate Holder partial N-5 Code Data Reports for the new Certificate Holder. However, small bore instrument and sample line materials that were partially installed by TVA were excluded from these Data Reports. These materials are traceable to Certified Material Test Reports and procurement documentation and were partially installed per plant design documents. However, since an N-520 expired Certificate Holder is not permitted to supply material, and the materials in question were excluded from partial N-5 Code Data Reports due to lack of welding documentation, the question arose if completion of installation using these materials was acceptable under Code Case N-520-3.

In response to a request for interpretation of Code Case N-520-3 by TVA, the ASME Section III Committee created the ASME Section Code Case N-520-5, "Alternative Rules for Renewal of Active or Expired N-type Certificates for Plants Not in Active Construction, Section III, Division 1." The attached Code Case N-520-5 (which includes the changes from Code Case N-520-4) is an advance copy from ASME and will be issued in Supplement 10 to the 2010 ASME Edition Code Cases.

IV. Reason for Request

TVA notified the NRC (Reference 1) of the intent to resume construction activities on WBN Unit 2 in 2007.

With the resumption of construction activities, TVA needed a means to transfer the partially completed ASME Section III piping systems and components, and the associated documentation, to the new Certificate Holder contracted to complete Unit 2. In this manner, the work previously performed under TVA's Certificates of Authorization could be credited toward the final completion of the unit's ASME Section III systems and components. This process is being controlled under the guidelines of Code Case N-520. Code Case revision N-520-5 was developed since it was not clear whether Code Case N-520-3 addressed transfer of partially installed material and supporting documentation to a new Certificate Holder. Code Case N-520-5 provides rules for the expired Certificate Holder to document procurement and partial installation of materials (welding not completed) and then transfer ownership of the material to the new Certificate Holder to complete installation of these materials at WBN Unit 2 under their ASME Section III, Division 1 program.

V. Proposed Alternative and Basis for Use

Pursuant to 10 CFR 50.55a(a)(3)(i), TVA is requesting approval for the use of the provisions of ASME Code Case N-520-5, "Alternative Rules for Renewal of Active or Expired N-type Certificates for Plants Not in Active Construction, Section III, Division 1," on the basis that this alternative will provide an acceptable level of quality and safety for the required quality processes of the construction of WBN Unit 2 to the rules and requirements of ASME Section III Division 1.

Code Case N-520 addresses the completion by a new Certificate Holder of ASME activities initiated by an expired Certificate Holder. The expired Certificate Holder is only allowed to

document and status ASME work performed under the original Certificates. The expired Certificate Holder is not allowed to perform new ASME Code work (i.e., procurement, design or construction) under the temporary N-520 Certificate.

In most cases, the completion of WBN Unit 2 involves the new Certificate Holder removing or repairing welds, materials, components, and appurtenances and installing new ASME Section III Division 1 welds, materials, components, and appurtenances which were procured and designed by the new Certificate Holder. Some ASME Section III Division 1 Code materials (e.g., pipe, elbows, tees, etc.) were purchased by the expired Certificate Holder and partially installed. The materials may have been cut, bent, dry fit, partially welded, and supported using engineering details and procedures. Code Case N-520-5 provides explicit authorization for a process for partially installed material and supporting documentation to be transferred from the expired Certificate Holder to the new Certificate Holder. The process will be used for instrument and sample line materials that were partially installed (i.e., cut, bent, dry fit, partially welded, and supported) but not welded into place. The partially installed material was stored in place in its intended final location and configuration. Code Case N-520-5 provides the process whereby the partially installed material and associated traceability documentation is transferred to the new Certificate Holder so that installation of the material can be completed by the new Certificate Holder. Documenting previously performed ASME Section III Division 1 work does not represent new ASME activities and is thus allowed under the provisions of Code Case N-520. The partial installation performed under the original Certificates represents storage in-place of previously supplied ASME material. This material will be made available for future use and installation by an authorized Certificate Holder.

The process described herein can only be applied for material which has fully traceable and appropriate ASME Section III Division 1 documentation (e.g., Certified Material Test Reports) and which was obtained and controlled under TVA's original Certificates. TVA will not be supplying new material or performing new ASME Section III Division 1 work under this process. The Certificate Holder which completes the installation will ensure the physical condition of the material is acceptable for use in an ASME Section III Division 1 application through evaluation or remediation. If the material is not acceptable, the material will be replaced.

The process will be documented in the expired/temporary Certificate Holder's N-520 ASME Quality Assurance manual and associated procedures as well as the new Certificate Holders ASME Section III Division 1 Quality Assurance manual and associated procedures. Both Quality Assurance manuals require approval by the Authorized Nuclear Inspection Supervisor.

The NRC Staff has not yet reviewed this revised Code Case nor approved its generic use by the industry through the usual process of incorporation into regulatory guides (RGs) (e.g., RG-1.84 or RG-1.147) and incorporation into the 10 CFR 50.55a rule paragraphs.

Code Case N-520-5, like N-520-3, imposes conditions on the Owner to ensure that conveyance of documentation and associated Code items, from the organization with the expired Certificates of Authorization to the new N-type Certificate Holder, is performed in a quality manner. The following attributes were added to the provisions of the Code Case via N-520-5 to ensure that the process conforms to ASME code requirements:

- 2.(b) The responsibility for material and supporting documentation procured to the original Construction Code, during initial construction, may be transferred to the new Certificate Holder, provided the following requirements are met:

- (1) The material is only for use to complete the construction of items originally included as part of expired Certificate Holder's scope.
- (2) The material is identified and traceable to a Certified Material Test Report and applicable procurement documentation.
- (3) The transfer process shall be defined and controlled by the Certificate Holders, documented in their Quality Assurance manuals, and reviewed and verified by the Authorized Nuclear Inspection Supervisor.

This process will ensure continuity between the previously performed ASME Section III work and the completion work that is to be performed by the contractor. The overall process will ensure that the appropriate Codes are applied to the construction activities at WBN Unit 2 to provide an acceptable level of quality and safety.

VI. Duration of Use of the Proposed Alternative

Application of the provisions of this request will commence upon approval of this relief request and site approval of implementing instructions and will continue until such time as the WBN Unit 2 N-3 Code Data Report is completed and signed by TVA, as the Owner; or the use of the Code Case is no longer necessary, nor allowed, in accordance with the provisions of the Code Case. Should the NRC impose additional requirements, they will be implemented prior to completion of the N-3 Code Data Report.

VII. Industry Precedents

Due to the unique circumstances associated with WBN Unit 2, there are no established precedents for the use of the revised ASME Section III Code Case, N-520-5.

VIII. Reference

1. TVA letter dated August 3, 2007, "Watts Bar Nuclear Plant (WBN) Unit 2 - Reactivation of Construction Activities" (ML072190047)

ENCLOSURE 2

Code Case N-520-5, "Alternative Rules for Renewal of Active or Expired N-Type Certificates for Plants Not in Active Construction, Section III, Division 1"

Approval Date: July 11, 2012

*Code Cases will remain available for use until annulled
by the applicable Standards Committee.***Case N-520-5****Alternative Rules for Renewal of Active or Expired
N-Type Certificates for Plants Not in Active
Construction****Section III, Division 1**

Inquiry: What alternative requirements (NCA-8100) may be used for the renewal of active or expired N-type Certificates held by the Owner/Designee/Certificate Holder of a nuclear power plant where fabrication and installation activities at the Owner's site have been interrupted?

Reply: It is the opinion of the Committee that an active N-type Certificate, or one that has been permitted to expire, as specified in the Inquiry may be renewed at the applicant's facilities by the Society, provided the following alternative rules are met:

1 CURRENT N-TYPE CERTIFICATES

(a) The applicant shall notify the Society and the Authorized Nuclear Inspection Agency of its intent to use this Code Case.

(b) The applicant is responsible for documenting compliance with the provisions of NCA-1140.

(c) The 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.

(d) An agreement with an accredited Authorized Nuclear Inspection Agency shall be maintained by N-type Certificate Holder in accordance with NCA-8130.

(e) For active Certificates not later than six months prior to the date of expiration of the N-type Certificate, the applicant shall apply for renewal of the certificate. The renewal application shall reference this Code Case. A letter from the Authorized Nuclear Inspection Agency recommending the renewal of the Certificate shall accompany the application.

(f) For N-type Certificates held by Owner's Designee/Certificate Holder, an audit as required by the Society shall be conducted prior to the renewal of the Certificate.

2 EXPIRED N-TYPE CERTIFICATES

(a) Where the N-type Certificate Holder has permitted the Certificates to expire, and has returned the Certification Mark to the Society, and the Owner plans to contract with a new Certificate Holder to complete construction of the nuclear facility, the expired Certificate Holder may apply to the Society for temporary Certificates of Authorization, and such Certificates and applicable Certification Mark shall be issued by the Society subject to the following conditions:

(1) The scope of the certificates shall be limited to the Code Edition and Addenda to which the nuclear plant has been docketed. No new Code work may be performed under these temporary Certificates. Repair welding of material imperfections and existing welds shall not be performed.

(2) An Accredited Authorized Nuclear Inspection Agency shall be employed to review the completed work and monitor and verify compilation and completion of all documentation such as Data Report Forms and supporting Data Packages.

(3) The ANI shall certify all partial Data Reports and authorize the temporary Certificate Holder to stamp the previously completed work with the appropriate Certification Mark.

(4) The Quality Assurance Program previously accepted by the Society shall be implemented (NCA-8140) and any revisions to the program shall be acceptable to the Authorized Nuclear Inspection Agency. All required revisions to the Quality Assurance Manual shall be reviewed and accepted by the ANIS prior to implementation. The revised program shall govern all activities required to document and stamp all previously completed work.

(5) A survey or audit by the Society shall be required for the issuance of the requested Certificates and Stamps to the expired Certificate Holder. Code activities performed prior to the issuance of the temporary Certificates shall be subject to the acceptance of the Inspector (NCA-8153).

(6) The Owner shall apply to the Society for an Owner's Certificate (NCA-8162), and the evaluation interview by the Society shall include a review of the scope of activities to be performed under the temporary Certificates.

The Committee's function is to establish rules of safety, relating only to pressure integrity, governing the construction of boilers, pressure vessels, transport tanks and nuclear components, and inservice inspection for pressure integrity of nuclear components and transport tanks, and to interpret these rules when questions arise regarding their intent. This Code does not address other safety issues relating to the construction of boilers, pressure vessels, transport tanks and nuclear components, and the inservice inspection of nuclear components and transport tanks. The user of the Code should refer to other pertinent codes, standards, laws, regulations or other relevant documents.



A complete list of all work remaining to be documented and stamped shall be provided to the AIA prior to completion of all work. The Regulatory Authority and the Jurisdictional and Enforcement Authority (if applicable) shall be notified of the completion of these activities.

(7) The term of the temporary Certificates shall be for one year, and may be extended twice by the Society upon receipt of a request submitted by certified mail for an additional period not to exceed one year each. Subsequent renewals shall be treated as renewals of active Certificates.

(8) The Owner shall maintain the Owner's Certificate in accordance with existing Code requirements until all Code activity has been completed, and the N-3 Data Report Form has been completed and filed [NCA-8180(c)].

(9) The temporary Certificates and Certification Mark shall be returned to the Society when all previously completed work has been documented and stamped.

(b) The responsibility for material and supporting documentation procured to the original Construction Code, during initial construction, may be transferred to the new Certificate Holder, provided the following requirements are met:

(1) The material is only for use to complete the construction of items originally included as part of expired Certificate Holder's scope.

(2) The material is identified and traceable to a Certified Material Test Report and applicable procurement documentation.

(3) The transfer process shall be defined and controlled by the Certificate Holders, documented in their Quality Assurance manuals, and reviewed and verified by the Authorized Nuclear Inspection Supervisor.

(c) The renewal application shall include a complete listing of any Code activities to be performed. A certificate providing for activities to meet the provisions of NB-2000, NC-2000, ND-2000, NE-2000, NF-2000, NG-2000 and NB-4000, NC-4000, ND-4000, NE-4000, NF-4000, NG-4000, and NB-5000, NC-5000, ND-5000, NE-5000, NF-5000, NG-5000, and NB-6000, NC-6000, ND-6000, NE-6000, NF-6000, NG-6000 shall not be issued without a survey as required by the Society.

(d) At least six months prior to performance of any Code activities not listed in the last renewal application, to meet the provisions of NX-2000, NX-4000, NX-5000, and NX-6000, the N-type Certificate Holder shall apply to the Society for a renewal survey.

(e) An audit as required by the Society shall be conducted prior to the renewal of the Certificate.

(f) The Certification Mark shall be returned to the Society prior to issuance of the renewal Certificate.



ENCLOSURE 3

List of Commitments

1. **Application of the provisions of this request will commence upon approval of this relief request and site approval of implementing instructions and will continue until such time as the WBN Unit 2 N-3 Code Data Report is completed and signed by TVA, as the Owner; or the use of the Code Case is no longer necessary, nor allowed, in accordance with the provisions of the Code Case. Should the NRC impose additional requirements, they will be implemented prior to completion of the N-3 Code Data Report.**