



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

March 12, 2013

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 - MODIFICATION OF TWO PREVIOUS STATEMENTS

- References:
1. TVA letter to NRC dated October 11, 2010, "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"
 2. TVA letter to NRC dated September 1, 2011, "Watts Bar Nuclear Plant (WBN) Unit 2 - American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Transition - Revised Commitment"

The purpose of this submittal is to provide modification to two statements contained in Reference 1. The first statement appears in the first paragraph on page 2 of Reference 1, which states as follows:

"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."

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By this letter, TVA modifies this statement to read as follows:

“Upon completion of system N-Stamping, WBN Unit 2 may elect to transfer jurisdiction of the ASME Section III Code piping system to the ASME Section XI Program, NPG-SPP-09.1, QA Program, TVA-NQA-PLN89-A, and related procedures.”

The second statement requiring modification also appears on page 2 of Reference 1 as the second sentence of the second paragraph and reads as follows:

“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.”

TVA modifies this statement to read as follows:

“All subsequent repair and replacement activities will be performed using the TVA’s ASME Section XI Repair and Replacement Program procedures which comply with 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.”

TVA makes these changes to provide greater flexibility for TVA to define internally when the jurisdiction for a given system transfers to Section XI. If a system is transferred to ASME Section XI, the Unit 2 Nuclear Construction organization will follow TVA’s ASME Section XI requirements/processes until the system is transferred to the Operating plant organization.


It is also important to note that neither of these two changes affects clarifications for the Section III to Section XI transition made in Reference 2. The clarifications made in Reference 2 remain valid as stated in that reference.

U.S. Nuclear Regulatory Commission
Page 3
March 12, 2013

No new commitments are made in this letter. If you have any questions, please contact me at (423) 365-3818.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 12th day of March, 2013.

Respectfully,



James H. O'Dell
Compliance Manager
Watts Bar Unit 2

cc: U. S. Nuclear Regulatory Commission
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