

## **NRR-PMDAPEm Resource**

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**From:** Minarik, Anthony  
**Sent:** Thursday, May 14, 2015 11:25 AM  
**To:** Bryan, Robert H Jr (rhbryan@tva.gov)  
**Cc:** Park, Sunwoo; Lupold, Timothy  
**Subject:** Containment ISI Request for Alternative RAI's (MF6154)  
**Attachments:** WBN-2 RAI-1 RfA CISI (MF6154) FINAL.pdf

Mr. Bryan:

Please see the attached questions from the NRC related to TVA's March 17, 2015 request for alternative regarding the containment in-service inspection program for the Watts Bar Nuclear Plant, Unit 2.

TVA expressed that they understood the questions as presented here, and will provide their responses by June 15, 2015.

Anthony Minarik  
301-415-6185

Office of Nuclear Reactor Regulation (NRR)  
Division of Operating Reactor Licensing (DORL)  
Watts Bar Special Projects Branch (LPWB)

Normal Hours:  
0600-1545: Mon-Fri

**Hearing Identifier:** NRR\_PMDA  
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**From:** Minarik, Anthony

**Created By:** Anthony.Minarik@nrc.gov

**Recipients:**

"Park, Sunwoo" <Sunwoo.Park@nrc.gov>  
Tracking Status: None  
"Lupold, Timothy" <Timothy.Lupold@nrc.gov>  
Tracking Status: None  
"Bryan, Robert H Jr (rhbryan@tva.gov)" <rhbryan@tva.gov>  
Tracking Status: None

**Post Office:**

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MESSAGE	562	5/14/2015 11:25:00 AM
WBN-2 RAI-1 RfA CISI (MF6154) FINAL.pdf		56118

**Options**

**Priority:** Standard  
**Return Notification:** No  
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**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

REQUEST FOR ADDITIONAL INFORMATION  
REQUEST FOR ALTERNATE ASME CODE SECTION XI FOR  
CONTAINMENT INSERVICE INSPECTION  
UTILIZING ASME CODE SECTION XI, 2007-2008  
TENNESSEE VALLEY AUTHORITY  
WATTS BAR NUCLEAR PLANT, UNIT 2  
DOCKET NUMBER 50-391

By letter dated March 17, 2015, Tennessee Valley Authority, submitted a request to use an alternative Edition and Addenda of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI for the Watts Bar Nuclear Plant (WBN) Unit 2 Containment Inservice Inspection (CISI) Program. The CISI Program applicable to WBN Unit 2 is the ASME Code Class MC (Metallic Containment) components for the initial 120-month inspection interval. The proposed alternative requests the use of the 2007 Edition with 2008 Addenda of ASME Code Section XI per 10 CFR 50.55a(b)(2) as conditioned by 10 CFR 50.55a(b)(2)(ix) on the date 12 months prior to Full-Power Licensing of WBN Unit 2.

The NRC staff requests the following additional information for its detailed safety evaluation.

1. In the cover page and in "Executive Summary" Section of the Enclosure the licensee characterized its request, as one seeking authorization to use an alternative to the codes and standards requirements pursuant to 10 CFR 50.55a(z)(1). However, in "Basis For Alternative" Section of the Enclosure, the licensee appears to invoke 10 CFR 50.55a(g)(4)(iv) as a regulatory basis for the request. It is to be noted that a request for authorization to use an alternative to the regulatory requirements pursuant to 10 CFR 50.55a(z)(1) is differentiated from a request for approval to use a subsequent Code edition and addenda incorporated by reference pursuant to 10 CFR 50.55a(g)(4)(iv). Please clarify and revise the request as needed.
2. In the cover page of the letter, the licensee states that the proposed alternative requests the use of the 2007 Edition with 2008 Addenda of ASME Code Section XI. Whereas, in the Enclosure, the licensee states that the proposed alternative is to utilize the latest-approved Edition and Addenda of ASME Code Section XI on the date 12 months prior to full-power licensing of WBN Unit 2. It is to be noted that the NRC may review and authorize the use of a singly designated Edition and Addenda and therefore the licensee is requested to provide clarity in this regard.
3. In several places in the Enclosure of its letter, the licensee made a reference to 10 CFR 50.55a(b)(2) which is believed to mean 10 CFR 50.55a(a)(1)(ii) in the newest version of 10 CFR 50.55a Section. Please clarify and correct accordingly.