

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-16-067

March 25, 2016

10 CFR 50.55a

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

> Watts Bar Nuclear Plant Unit 2 Facility Operating License No. NPF-96 NRC Docket No. 50-391

- Subject: Watts Bar Nuclear Plant Unit 2 Augmented Proposed Alternative to the Request for Approval of an Alternative to the Preservice Examination Requirements of American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code for Snubbers (WBN-2/PSI-4)
- Reference: TVA letter to NRC, CNL-16-042, "Watts Bar Nuclear Plant Unit 2 Request for Approval of an Alternative to the Preservice Examination Requirements of American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code for Snubbers (WBN-2/PSI-4)," dated March 11, 2014 (ML16074A274)

In the referenced letter, Tennessee Valley Authority (TVA) submitted a request for an alternative (WBN-2/PSI-4) to the requirements of the American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, 2001 Edition through 2003 Addenda, Subsection ISTD, Section ISTD-4110(d), "Preservice Examination Requirements," for the Watts Bar Nuclear Plant (WBN) Unit 2 Class 2 steam generator (SG) snubbers. This alternative request was submitted in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a, "Codes and Standard," paragraph (z)(1).

On March 17, 2016, the Nuclear Regulatory Commission (NRC) and TVA conducted a conference call regarding this alternative request. In the Proposed Alternative and Basis for Use section of Enclosure 1 to the referenced letter, TVA describes the monitoring of the fluid level of the four SG snubber reservoirs during WBN Unit 2 operation until the first refueling outage. During the conference call on March 17, 2016, the NRC questioned the frequency for monitoring the fluid levels in the SG snubber reservoirs during the WBN Unit 2 preservice

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test period¹ up to start of the first WBN Unit 2 inservice test interval (i.e., start of unit commercial service). As discussed during the conference call, TVA is augmenting the frequency of monitoring the SG snubber reservoirs as follows:

TVA will perform periodic monitoring of fluid levels in the four SG snubber reservoirs during the WBN Unit 2 preservice test period up to start of the first WBN Unit 2 inservice test interval. The level monitoring will be performed weekly until WBN Unit 2 reaches normal operating pressure and temperature and sufficient reservoir level data points have been collected to establish a trend. The level monitoring frequency will be adjusted commensurate with the reservoir level trend. The adjusted monitoring frequency during the WBN Unit 2 preservice test period up to the start of the first WBN Unit 2 inservice test period will not exceed a monthly frequency.

As described in Enclosure 1 to the referenced letter, TVA will continue to monitor the fluid level of the four SG snubber reservoirs during WBN Unit 2 operation until the first refueling outage.

There are no new regulatory commitments associated with this submittal. Please address any questions regarding this response to Gordon Arent at 423-365-2004.

Respectfully,

Nem hr

J. W. Shea Vice President, Nuclear Licensing

CC:

NRC Regional Administrator - Region II NRC Senior Resident Inspector - Watts Bar Nuclear Plant, Unit 1 NRC Senior Resident Inspector - Watts Bar Nuclear Plant, Unit 2 NRR Project Manager - Watts Bar Nuclear Plant

¹ As defined in Section ISTA-2000 of the ASME OM code, the preservice test period is the period of time following completion of construction activities related to the component and before first electrical generation by nuclear heat.