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SUBJECT: Responds to staff understanding of util commitments re development of insp methods & repair criteria for P4D core spray sys piping weld.

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Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

April 7, 1997

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

Gentlemen:

In the Matter of) Docket No. 50-296
Tennessee Valley Authority)

BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 3 - REACTOR PRESSURE
VESSEL INTERNALS, AUGMENTED WELD INSPECTION - EVALUATION OF
INDICATIONS AT THE CORE SPRAY SYSTEM PIPING COLLAR-TO-SHROUD
WELD - 30-DAY RESPONSE TO NRC'S ASSESSMENT (TAC NO. M98059)

This letter responds to the Staff's understanding of TVA's
commitments regarding the development of inspection methods
and repair criteria for the P4D Core Spray System piping
weld.

On March 7, 1997, TVA submitted a description of flaws
identified during an inspection of core spray piping within
the reactor vessel for BFN Unit 3. TVA provided an
evaluation of the effect of the identified flaws on the
structural integrity of the core spray piping. In addition,
TVA provided supplemental information, by letters dated
March 9, 1997 and March 10, 1997.

In the March 10, 1997 letter, TVA committed to work with the
Boiling Water Reactor Vessel and Internals Project (BWRVIP)
Committee to develop inspection methods and repair criteria
for the P4D weld. TVA also committed to reinspect or repair
the Core Spray System piping and to provide its plans to the
staff 120 days prior to the start of the BFN Unit 3 Cycle 8

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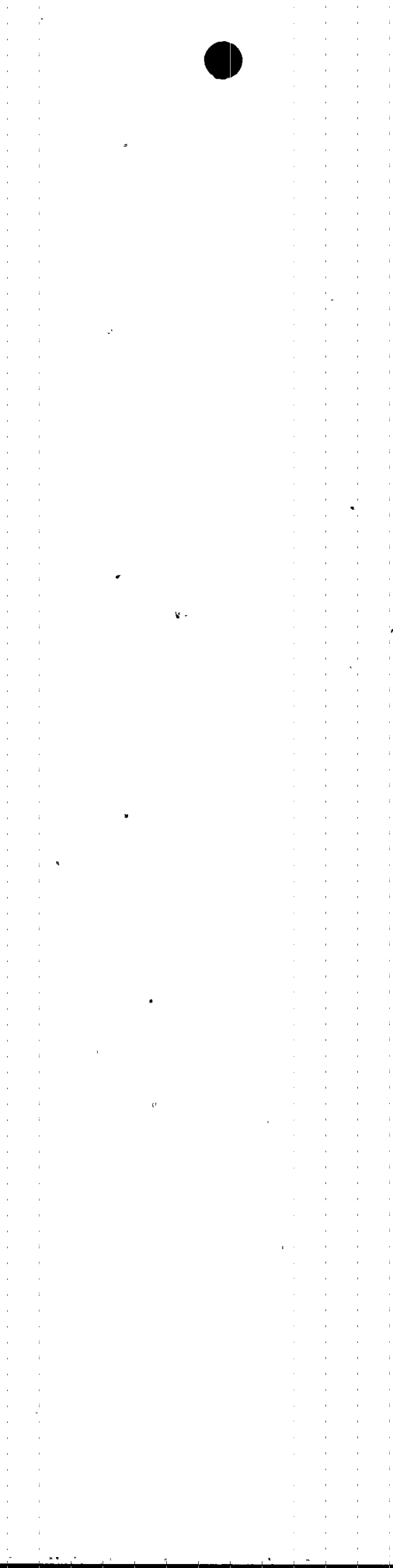
refueling outage. As part of this commitment, TVA may pursue several avenues to demonstrate that the observed indications at the P4D weld originate at the outside diameter (OD). These include but are not limited to:

- Working with the BWRVIP Committee to develop an Ultrasonic Testing (UT) inspection methodology and criteria for repair of the subject weld,
- Comparison of the observed indications to indications known to be caused by cold working, which results in OD originated cracking,
- Comparison of the observed indications to indications known to be originated from the inside diameter of piping,
- Comparison of the observed indications to indications observed and evaluated at other facilities,
- Evaluating the feasibility of grinding down the indication to demonstrate it was OD originated, and/or
- Evaluation of Core Spray System operability considering the absence of the P4D weld.

As noted in NRC's March 11, 1997 letter to TVA, responsibility for assurance of the integrity of the core spray piping at the time of reactor restart lies with TVA. Therefore, absent of a subsequently defined regulatory framework, TVA intends to continue to submit the results of future Core Spray System piping inspections and evaluations to the NRC for the Staff's information as soon as practical after completion of the activities.



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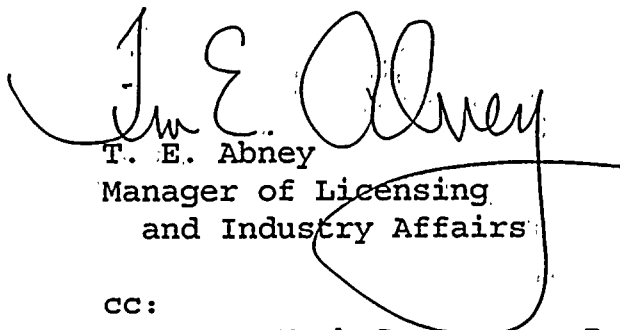


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There are no new commitments in this letter. If you have any questions, please call me at (205) 729-2636.

Sincerely,



T. E. Abney
Manager of Licensing
and Industry Affairs

cc:

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