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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

October 16, 1997

Mr. Oliver D. Kingsley, Jr. President, TVA Nuclear and Chief Nuclear Officer Tennessee Valley Authority 6A Lookout Place 1101 Market Street Chattanooga, Tennessee 37402-2801

SUBJECT: RELIEF REQUESTS - BROWNS FERRY NUCLEAR PLANT, UNIT 2 (TAC NO. M99004)

Dear Mr. Kingsley:

By letter dated June 4, 1997, the Tennessee Valley Authority (TVA) submitted requests for relief from specified requirements of the American Society of Mechanical Engineers (ASME) Section XI inservice inspection (ISI) and system pressure test (SPT) programs for the Browns Ferry Nuclear Plant (BFN) Unit 2. On August 11, 1997, the Nuclear Regulatory Commission (NRC) staff requested additional information regarding these relief requests. TVA responded to this request on September 9, 1997.

The NRC staff, with the assistance of its contractor, the Idaho National Engineering and Environmental Laboratory, has reviewed the information provided by TVA. The results of this review are summarized below. Additional details are provided in the enclosed Safety Evaluation and Technical Letter Report.

With regard to TVA's request for relief 2-SPT-10 to use Code Case N-546 in lieu of ASME Code requirements for inservice inspector qualifications, the NRC staff concludes that TVA's proposed alternative, including additional commitments made and described in TVA's letter of September 9, 1997, provides an acceptable level of quality and safety. Therefore, TVA's request to implement Code Case N-546 is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

Use of Code Case N-546 is authorized for the current interval or until such time as the Code Case is published in Regulatory Guide (RG) 1.147. From that time, if TVA intends to continue to implement this Code Case, TVA is to follow all provisions in Code Case N-546, with limitations issued in RG 1.147, if any.

With regard to TVA's request 2-ISI-7 for relief from ASME Code requirements for volumetric or surface examination of integrally welded attachments, the NRC staff has concluded that for supports 2-47B415S009, 2-47B415S023, and 2-47B415S025. TVA has demonstrated that the specific Section XI requirement is impractical. Therefore, the NRC staff concluded that pursuant to 10 CFR 50.55a(g)(6)(i) relief is authorized. Furthermore, authorizing relief will not endanger life, property, or the common defense and security and is otherwise in the public interest, giving due consideration to the burden upon TVA that could result if the requirement were imposed on the facility.

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Mr. O. D. Kingsley

For supports 2-47B15H0002, 2-47B15H0004, 2-47B15H0006, 2-47B15H0008, 2-47B15H0010, and 2-47B15H0012, as listed in request for relief 2-ISI-7, the NRC staff has concluded that relief is denied, because TVA did not demonstrate that the specific Section XI requirements were impractical. The factors cited by TVA for these components, such as personnel dose, constitute hardship, so relief under 10 CFR 50.55a(a)(3)(ii) appears to be more appropriate. The staff finds that TVA did not provide sufficient information to support relief under 10 CFR 50.55a(g)(6)(i), as requested. It is the staff's understanding, based on telephone conversations with TVA personnel, that TVA has inspected other components instead of these 6 supports in order to ensure Code requirements are fulfilled.

Relief requests 2-SPT-9, 2-SPT-11, and 2-SPT-12 were withdrawn by TVA in its letter of September 9, 1997.

Please call Joe Williams at (301)415-1470 if you have any questions regarding this topic.

Sincerely,

Frederick J. Hebdon, Director / Project Directorate II-3 Division of Reactor Projects - I/II / Office of Nuclear Reactor Regulation

Docket No. 50-260

Enclosures: 1. Safety Evaluation 2. Technical Letter Report

cc: See next page

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Mr. O. D. Kingsley

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cc: See next page

Mr. Oliver D. Kingsley, Jr. Tennessee Valley Authority

cc:

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