Mr. O. J. Zeringue Chief Nuclear Officer and Executive Vice President Tennessee Valley Authority 6A Lookout Place 1101 Market Street Chattanooga, Tennessee 37402-2801

#### SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - BROWNS FERRY NUCLEAR PLANT, UNIT 3 REVISED RELIEF REQUEST 3-ISI-1 (TAC NO. MA1153)

#### Dear Mr. Zeringue:

By letter dated February 17, 1998, the Tennessee Valley Authority (TVA) submitted revised relief request 3-ISI-1 regarding the Browns Ferry Nuclear Plant, Unit 3 (BFN-3) reactor pressure vessel (RPV) shell weld inspections. TVA performed the BFN-3 augmented examination during the Fall 1993 extended outage; 15 indications exceeded the American Society of Mechanical Engineers (ASME) acceptance criteria. TVA analyzed the indications and determined that the BFN-3 RPV was acceptable for continued service.

TVA previously requested relief from the three successive examinations by letter dated January 22, 1997. This request was denied by the U.S. Nuclear Regulatory Commission (NRC) for a number of reasons, including the fact that TVA had not validated the fracture mechanics analysis by subsequent examinations to verify that the subject flaws were not growing beyond calculated projections.

The revised relief request seeks relief for one operating cycle from the requirements of the 1989 Edition (no addenda) of ASME Section XI, Subarticle paragraph IWB-2420(b). This paragraph states that "If flaw indications or relevant conditions are evaluated in accordance with IWB-3132.4 or IWB-3142.4, respectively, and the component qualifies as acceptable for continued service, the areas containing such flaw indications or relevant conditions shall be reexamined during the next three inspection periods listed in the schedule of the inspection programs of IWB-2410."

The staff has reviewed the revised relief request, and has developed additional questions. The information requested in the enclosure is needed to complete our review. Please provide your response by June 12, 1998.

Sincerely,

151

Albert W. De Agazio, Sr. Project Manager Project Directorate II-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-296 Serial No. BFN-98-012

Enclosure: As stated

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# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 19, 1998

Mr. O. J. Zeringue Chief Nuclear Officer and Executive Vice President Tennessee Valley Authority 6A Lookout Place 1101 Market Street Chattanooga, Tennessee 37402-2801

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Albert W. De Agazio, Sr. Project Manager Project Directorate II-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-296 Serial No. BFN-98-012

Enclosure: As stated

cc: See next page

Mr. O. J. Zeringue Tennessee Valley Authority

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Mr. Timothy E. Abney, Manager Licensing and Industry Affairs Browns Ferry Nuclear Plant Tennessee Valley Authority P.O. Box 2000 Decatur, AL 37402-2801

Regional Administrator, Region II U.S. Nuclear Regulatory Commission 61 Forsyth Street, SW., Suite 23T85 Atlanta, GA 30303-3415

Mr. Leonard D. Wert Senior Resident Inspector U.S. Nuclear Regulatory Commission Browns Ferry Nuclear Plant 10833 Shaw Road Athens, AL 35611

State Health Officer Alabama Dept. of Public Health 434 Monroe Street Montgomery, AL 35130-1701

Chairman Limestone County Commission 310 West Washington Street Athens, AL 35611

# REQUEST FOR ADDITIONAL INFORMATION BROWNS FERRY NUCLEAR PLANT, UNIT 3 THE TENNESSEE VALLEY AUTHORITY DOCKET NO. 50-296

The staff requests additional information for the Tennessee Valley Authority (TVA) revised relief request 3-ISI-1 regarding the Browns Ferry Nuclear Plant, Unit 3 (BFN-3) reactor pressure vessel (RPV) shell weld inspections.

- Provide justification that each of the 15 flaws found in the BFN-3 vessel during the Fall 1993 augmented examination are subsurface by considering the (1) uncertainties of the nondestructive examination (NDE) method, (2) size, and (3) location of each flaw.
- 2) Part of the basis for the requested relief is that the General Electric (GE) GERIS 2000 system that was used to perform the previous RPV examination is not available for the refueling outage scheduled to begin in October 1998. TVA asserts that a modified system similar to the previously utilized system would need to be constructed due to availability issues. GERIS 2000 is Performance-Demonstration-Initiative (PDI) qualified. PDI qualification of equipment, procedures, and personnel demonstrates that examination and evaluation techniques are repeatable.

Please provide information on alternate vendors that are PDI qualified and have equipment that are available for the upcoming cycle 8 outage.

3) It is stated on Page 3 of "General Electric Corporation Flaw Evaluation Extending Service Lifetime of Browns Ferry Unit 3 Reactor Pressure Vessel Flaws to Forty Years (Design Service Lifetime)" which is Attachment 3 to your February 17, 1998, letter:

"As operation continues past 12 EFPY, and vessel irradiation increases, the leak test temperature also increases as required to meet 10 CFR 50 Appendix G requirements for the vessel P-T curves. As a result, the (T-RT<sub>NDT</sub>) temperature difference increases with time for non-beltline weld locations such as are evaluated here."

To substantiate this statement, please (a) provide the leak test temperature as a function of years of operation; (b) provide the fluence for Weld H23 to clearly rule out any meaningful embrittlement to Weld H23 due to fluence; and (c) confirm that the increase in T exceeds the increase in RT<sub>NDT</sub> for Welds H34, H45, V4, and VFW during 40 years of operation.

4) On Page 11 of "Browns Ferry Unit III Flaw Evaluation Handbook" GENE-523-120-0992, (Reference 1 to Attachment 3 of your February 17, 1998, letter), Equation (2-5) is reported to be cited from the paper by Paris and Sih (Reference 11). Please verify its accuracy and provide the Equation No. from Paris' paper that you cited.