
Browns Ferry Nuclear Plant

Browns Ferry Nuclear Plant (BFN)

Pre-submittal Meeting for Request to Use a Later Edition of the ASME OM Code for the Fifth
Inservice Testing (IST) 10-Year Interval

September 22, 2022

Agenda

- Introduction
- Background
- Request to Adopt the 2020 Edition of the ASME OM Code
- Schedule for Submittal

Introduction

- The purpose of the meeting is to provide information regarding the Tennessee Valley Authority (TVA) plan to submit a request to utilize the 2020 Edition of the OM Code, in its entirety, and to obtain Nuclear Regulatory Commission (NRC) feedback.

Background

- The code of record for BFN for the fourth 10-year IST Interval was the ASME OM Code 2004 Edition through 2006 Addenda.
- The end of the fourth 10-year IST Interval was extended from August 30, 2022, to August 30, 2023, as allowed by ISTA-3120(d). Therefore, the fifth 10-year IST interval is required to begin no later than August 31, 2023.
- In accordance with 10 CFR 50.55a(f)(4)(ii), TVA would be required to adopt the 2017 edition of the ASME OM Code for the BFN fifth 10-year IST interval. However, as noted in the following slide, TVA plans to adopt the 2020 Edition of the ASME OM Code for the BFN fifth 10-year IST interval, once endorsed through rulemaking.
- In accordance with 10 CFR 50.55a(f)(4)(iv), TVA plans to seek NRC approval to use the 2020 edition of ASME OM Code for the fifth 10-year IST interval.

Request to Adopt the 2020 Edition of the ASME OM Code

- In accordance with 10 CFR 50.55a(f)(4)(iv) and in accordance with the guidance provided in Regulatory Issue Summary (RIS) 2004-12, "Clarification on the Use of Later Editions and Addenda to the ASME OM Code and Section XI," TVA plans to request NRC approval to use the ASME OM Code, 2020 Edition, in its entirety, subject to the conditions in 10 CFR 50.55a(b)(3), for the pumps, valves, and snubbers contained in the BFN IST Program.
- TVA understands that the Federal Register Notice revising 10 CFR 50.55a to endorse the ASME OM Code, 2020 Edition is going through final review and is expected to be published in final rulemaking by the end of September 2022.

Request to Adopt the 2020 Edition of the ASME OM Code (cont'd)

- As stated in RIS 2004-12:

The request to use a later edition and addenda is not a relief request; it is simply a request to use a later Code. ...The amount of written documentation needed for a request to use a later Code edition and addenda is significantly less than for a relief request or a request to use an alternative requirement.

If portions of a later Code edition and addenda are used, licensees must assure that all related requirements of the respective editions and addenda are met. A discussion of the related requirements should be included in the letter to the NRC. The regulations do not specify when the letter must be submitted, only that it be submitted before using the proposed later Code edition and addenda.

- There would be no related requirements associated with the proposed later Code edition for consideration associated with this request because the 2020 Edition of the OM code is being adopted in its entirety.

Request to Adopt the 2020 Edition of the ASME OM Code (cont'd)

- TVA plans to have a separate meeting to discuss the proposed alternative requests for the BFN fifth 10-year IST interval. These alternative requests plan to reference the 2020 Edition of the OM code.
- Can TVA proceed with submitting the alternative requests for the fifth 10-year interval, taking credit for the 2020 Edition of the OM code, pending NRC review of the above request?

Schedule for Submittal

- TVA plans to submit the request to adopt the 2020 Edition of the ASME OM Code to NRC by October 31, 2022 (depending on the issuance of the FRN to 10 CFR 50.55a).
- Requesting NRC approval by December 15, 2022, to support the schedule needed to update the procedures and processes for the upcoming BFN fifth 10-year IST interval.
- Separate meeting planned for mid-October 2022 to discuss the alternative requests for the BFN fifth 10-year IST interval.

TVA

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