



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

September 28, 2022

LICENSEE: Tennessee Valley Authority

FACILITY: Browns Ferry Nuclear Plant, Units 1, 2 and 3

SUBJECT: SUMMARY OF SEPTEMBER 22, 2022, PUBLIC MEETING WITH TENNESSEE VALLEY AUTHORITY TO DISCUSS A REQUEST TO USE A LATER EDITION OF THE ASME OM CODE (EPID L-2022-LRM-0073)

On September 22, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff held a public teleconference with representatives of the Tennessee Valley Authority (TVA, the licensee) to discuss a planned request for Browns Ferry Nuclear Plant (Browns Ferry), Units 1, 2, and 3. The request would be to use the 2020 Edition of the American Society of Mechanical Engineers (ASME) *Operation and Maintenance of Nuclear Power Plants*, Division 1, OM Code: Section IST (OM Code) in its entirety, as incorporated by reference in Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a, "Codes and standards." The meeting notice and agenda for this meeting, dated September 12, 2022, are available in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML22264A014. The licensee's slides for the meeting are available in ADAMS (ML22264A233). A list of the meeting attendees is enclosed. No regulatory decisions were made at this meeting.

The licensee explained that its Fourth 10-Year Inservice Testing (IST) Program interval at Browns Ferry will end on August 30, 2023, which includes the 1-year extension allowed by ASME OM Code, Subsection ISTA, paragraph ISTA-3120(d). The OM Code of record for the Fourth 10-Year IST Program interval at Brown Ferry is the ASME OM Code, 2004 Edition through 2006 Addenda, as incorporated by reference in 10 CFR 50.55a. In accordance with 10 CFR 50.55a(f)(4)(ii), TVA would be required to adopt the edition of the ASME OM Code that is in effect 18 months prior to the start of the Fifth 10-Year IST Program interval at Browns Ferry, which would be the 2017 Edition of the ASME OM Code. However, the licensee stated that it plans to request the use of the later 2020 Edition of the ASME OM Code for the Fifth 10-Year IST Program interval at Browns Ferry, following final issuance of the rule change in 10 CFR 50.55a to incorporate by reference the 2020 Edition of the ASME OM Code with conditions, and applicable ASME OM Code Cases. The licensee noted that the NRC has issued a proposed rule to incorporate by reference the 2020 Edition of the ASME OM Code into 10 CFR 50.55a, and that the final rule is expected to be issued soon. TVA also noted that according to the guidance in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on the Use of Later Editions and Addenda to the ASME OM Code and Section XI," a request to use a later edition of the ASME OM Code that has been incorporated by reference in 10 CFR 50.55a is a request under 10 CFR 50.55a(f)(4)(iv), and is not an alternative request under 10 CFR 50.55a(z). In a 10 CFR 50.55a(f)(4)(iv) request to use a later OM Code edition that has been incorporated by reference in 10 CFR 50.55a, a licensee must assure that all related requirements of the respective edition are met subject to NRC approval. TVA plans to propose the use of the 2020 Edition of the ASME OM Code in its entirety; therefore, all related requirements within the 2020 Edition of the ASME OM Code will be addressed. In addition, the

licensee will need to address the applicable conditions specified in 10 CFR 50.55a for the implementation of the 2020 Edition of the ASME OM Code when the final rule is issued.

TVA noted that it is preparing 10 CFR 50.55a relief and alternative requests as part of its development of the IST Program for the Fifth 10-Year IST Program interval at Browns Ferry that assume the use of the 2020 Edition of the ASME OM Code. In addition to these relief and alternative requests, TVA plans to submit a request to the NRC staff to apply the 2020 Edition of the ASME OM Code during the Fifth 10-Year IST Program interval at Browns Ferry. TVA is determining whether it should proceed with the submission of the relief and alternative requests for the Fifth 10-Year IST Program interval while the NRC is also reviewing the request to use the 2020 Edition of the ASME OM Code at Browns Ferry.

The NRC staff explained that TVA has a couple of options for requesting NRC approval of the use of the 2020 Edition of the ASME OM Code at Browns Ferry:

(1) prior to the issuance of the final rule to incorporate by reference the 2020 Edition of the ASME OM Code into 10 CFR 50.55a, TVA could submit an alternative request in accordance with 10 CFR 50.55a(z)(1) demonstrating that the use of the 2020 Edition of the ASME OM Code will provide an acceptable level of quality and safety in lieu of the 2017 Edition of the ASME OM Code as incorporated by reference in 10 CFR 50.55a, or

(2) TVA could submit a request under 10 CFR 50.55a(f)(4)(iv) to use the 2020 Edition of the ASME OM Code in anticipation that the final rule incorporating by reference the 2020 Edition of the ASME Code into 10 CFR 50.55a will be issued soon.

If TVA submits a request under either option to use the 2020 Edition of the ASME OM Code based on the proposed rule language, and the language of the final rule impacts the request, TVA will need to supplement its request to address the final rule language. If TVA submits a request under 10 CFR 50.55a(f)(4)(iv) to use the 2020 Edition of the ASME OM Code and the issuance of the final rule incorporating by reference the 2020 Edition of the ASME OM Code into 10 CFR 50.55a is delayed (such as until the end of 2022), TVA will need to submit an alternative request under 10 CFR 50.55a(z) to use the 2020 Edition of the ASME OM Code, such that the NRC staff will have time to review the full package of requests for the Browns Ferry Fifth 10-Year IST Program interval in a timely manner to support the August 2023 start date for that interval.

The NRC staff considered that the most efficient path might be for TVA to submit a 10 CFR 50.55a(f)(4)(iv) request to use the 2020 Edition of the ASME OM Code at Browns Ferry, as part of the package of 10 CFR 50.55a requests for the Fifth 10-Year IST Program interval, in anticipation of the issuance of the final rule for the 2020 Edition of the ASME OM Code in the near future. TVA indicated that the package of 10 CFR 50.55a requests for the Fifth 10-Year IST Program interval at Browns Ferry will likely be submitted in November 2022. By using this approach, both TVA and the NRC staff will likely avoid expending significant efforts to prepare and review a 10 CFR 50.55a(z) alternative request to use the 2020 Edition of the ASME OM Code that would be unnecessary when the final rule incorporating by reference the 2020 Edition of the ASME OM Code into 10 CFR 50.55a is issued. Following issuance of the final rule, only the 10 CFR 50.55a(f)(4)(iv) request would be necessary to support the use of the 2020 Edition of the ASME OM Code at Browns Ferry.

A pre-submittal meeting to discuss the planned 10 CFR 50.55a requests for the Browns Ferry Fifth 10-Year IST Program interval is currently scheduled for October 13, 2022.

No members of the public were in attendance. No comments or public meeting feedback forms were received.

Please direct any inquiries to me at 301-415-1627 or Kimberly.Green@nrc.gov.

/RA/

Kimberly J. Green, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-259, 50-260, and 50-296

Enclosure: List of Attendees

cc: Listserv

LIST OF ATTENDEES

SEPTEMBER 22, 2022, TELECONFERENCE WITH TENNESSEE VALLEY AUTHORITY

REGARDING USE OF LATER ASME OM CODE EDITION

FOR BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2 AND 3

Name	Organization
Kim Green	U.S. Nuclear Regulatory Commission (NRC)
Thomas Scarbrough	NRC
Gurjendra Bedi	NRC
Russ Wells	Tennessee Valley Authority (TVA)
Beau Eckermann	TVA
Gordon Williams	TVA
Mark Gowin	TVA
Fred Nilsen	TVA
Robert Smith	TVA

SUBJECT: SUMMARY OF SEPTEMBER 22, 2022, PUBLIC MEETING WITH TENNESSEE VALLEY AUTHORITY TO DISCUSS A REQUEST TO USE A LATER EDITION OF THE ASME OM CODE (EPID L-2022-LRM-0073) DATED SEPTEMBER 28, 2022

DISTRIBUTION:

PUBLIC
PM File Copy
RidsACRS_MailCTR Resource
RidsNrrDorlLpl2-2 Resource
RidsNrrPMBrownsFerry Resource
RidsNrrLARButler Resource
RidsRgn2MailCenter Resource
RidsNrrDorl Resource
RidsNrrDexEmib Resource
RidsNrrDexEicb Resource
RidsNrrDraApla Resource
RidsNrrDraAplb Resource
RidsNrrDraAplb Resource
TScarborough, NRR
GBedi, NRR
JRankin, NRR
SLav, NRR
DJohnson, OEDO
ROrlikowski, OEDO

ADAMS Accession No.: ML22266A274

OFFICE	NRR/DORL/LPL2-2/PM	NRR/DORL/LPL2-2/LA	NRR/DORL/LPL2-2/BC	NRR/DORL/LPL2-2/PM
NAME	KGreen	RButler	DWrona	KGreen
DATE	9/23/2022	9/27/2022	9/28/2022	9/28/2022

OFFICIAL RECORD COPY