



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

December 2, 2022

LICENSEE: Tennessee Valley Authority

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

SUBJECT: SUMMARY OF OCTOBER 13, 2022, MEETING WITH TENNESSEE VALLEY AUTHORITY TO DISCUSS PLANNED ALTERNATIVE REQUESTS FOR THE FIFTH 10-YEAR INSERVICE TESTING PROGRAM INTERVAL (EPID L-2022-LRM-0077)

On October 13, 2022, a virtual observation public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of the Tennessee Valley Authority (TVA, the licensee). The purpose of the meeting was to discuss planned alternative requests for the fifth 10-Year Inservice Testing (IST) Program interval for the Browns Ferry Nuclear Plant, Units 1, 2, and 3 (Browns Ferry or BFN). The meeting notice and agenda, dated September 29, 2022, are available in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML22272A570. A list of attendees is provided in the enclosure.

The licensee presented (ML22285A190) and discussed the following:

- Background
  - American Society of Mechanical Engineers (ASME) Code of Record for the fifth 10-Year IST Program interval at BFN is the 2017 Edition of the ASME OM Code. TVA plans to seek NRC approval to use the 2020 Edition of ASME OM Code for the fifth 10-Year IST Program interval.
- The licensee discussed multiple planned requests (shown below), including the affected components, applicable ASME Code requirements, reason for request, and basis for use. The licensee plans to submit the code edition request along with the following alternative requests.
  - Request BFN-IST-1
    - Alternative to Title 10 of the *Code of Federal Regulations* (CFR), paragraph 10 CFR 50.55a(b)(3)(xi) for implementing ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for supplementing the control rod drive (CRD) system scram discharge vent (SDV) and drain valve position indicating lights with other indications.
  - Request BFN-IST-2
    - Alternative to 10 CFR 50.55a(b)(3)(xi) for implementing ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for supplementing manually operated passive residual heat removal (RHR) system valve position indicating lights with other indications.

- Request BFN-IST-3
  - Alternative to 10 CFR 50.55a(b)(3)(xi) for implementing ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for supplementing main steam line (MSL) drain valve position indicating lights with other indications.
- Request BFN-IST-4
  - Alternative to 10 CFR 50.55a(b)(3)(xi), ASME OM Code, Subsection ISTC, and Mandatory Appendices I and IV, for main steam relief valves (MSRVs).
- Request BFN-IST-5
  - Alternative to 10 CFR 50.55a(b)(3)(xi) for implementing ASME OM Code, Subsection ISTC, paragraph ISTC-3700, for supplementing emergency equipment cooling water (EECW) strainer backwash valve position indicating lights with other indications.
- For each planned request, the licensee noted that the request duration would be for the fifth 10-Year IST Program interval.
- The licensee noted that they are not aware of any precedents for the planned alternative requests.
- The licensee plans to submit the requests by November 30, 2022, and will request NRC authorization by August 31, 2023.

The NRC staff provided the following feedback in response to the licensee's presentation:

- With respect to planned request BFN-IST-1, the staff recommended that the alternative request specify the supplemental position verification method for the SDV vent and drain valves and the proposed verification interval as an alternative to the requirements in the ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as supplemented by 10 CFR 50.55a(b)(3)(xi), rather than referencing the Technical Specifications (TS) or Surveillance Frequency Control Program (SFCP) in the request. The licensee may reference an applicable ASME OM Code Case that has been accepted in NRC Regulatory Guide 1.192 as incorporated by reference in 10 CFR 50.55a in the alternative request, or may include a justification for the use of an applicable OM Code Case directly in the alternative request prior to the acceptance of the OM Code Case in RG 1.192.
- With respect to planned request BFN-IST-2, the staff recommended that the alternative request specify the supplemental position verification method for the locally manually operated RHR system valves and the proposed verification interval as an alternative to the requirements in the ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as supplemented by 10 CFR 50.55a(b)(3)(xi). The licensee should provide justification that these specified passive valves have no safety function to open, and no procedures that require their opening.
- With respect to planned request BFN-IST-3, the staff recommended that the alternative request specify the supplemental position verification method for the (MSL) drain valves and the proposed verification interval as an alternative to the requirements in the ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as supplemented by 10 CFR 50.55a(b)(3)(xi). The staff recommended that the licensee review the recent report on valve stem-disk connections prepared by the Electric Power Research Institute (EPRI) and reviewed by the NRC in a safety evaluation for information that could help support its justification for an alternative to the ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as supplemented by 10 CFR 50.55a(b)(3)(xi).

- With respect to planned request BFN-IST-4, the staff recommended that the licensee clarify the specific requirements in the ASME OM Code, paragraph ISTC-3700, Appendix I and Appendix IV, as supplemented by 10 CFR 50.55a(b)(3)(xi) for which an alternative is being requested for the MSRVs. For example, the licensee should provide justification that the Appendix I testing meets the intent of the Appendix IV testing that the MSRVs are operationally ready to perform their safety functions if this is an alternative being requested by the licensee. The staff also requested that the licensee clarify the discussion of the credit for remote-manual operation of only 6 of the 13 MSRVs. The staff recommended that for each aspect of the request, the licensee specify the alternative method and interval for the applicable ASME OM Code requirements as incorporated by reference in 10 CFR 50.55a.
- With respect to planned request BFN-IST-5, the staff recommended that the alternative request specify the supplemental position verification method for the EECW strainer backwash valves and the proposed verification interval as an alternative to the requirements in the ASME OM Code, Subsection ISTC, paragraph ISTC-3700, as supplemented by 10 CFR 50.55a(b)(3)(xi). For example, the staff recommended that the licensee discuss verification of both the open and close valve positions as part of the alternative request. The staff also noted that the EPRI report and NRC safety evaluation on valve stem-disk connections might provide useful information for the alternative request.

There were no members of the public in attendance.

Please direct any inquiries to me at 301-415-3867, or [Michael.Mahoney@nrc.gov](mailto:Michael.Mahoney@nrc.gov).

Sincerely,

*/RA/*

Michael Mahoney, 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

OCTOBER 13, 2022, PUBLIC MEETING WITH TENNESSEE VALLEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2 AND 3

PLANNED ALTERNATIVE REQUESTS FOR THE FIFTH INSERVICE

TESTING PROGRAM INTERVAL

<b>Name</b>	<b>Organization</b>
Michael Mahoney	U.S. Nuclear Regulatory Commission (NRC)
Thomas Scarbrough	NRC
Gurjendra Bedi	NRC
Stewart Bailey	NRC
Yuken Wong	NRC
Perry Buckberg	NRC
Russ Wells	Tennessee Valley Authority (TVA)
Beau Eckermann	TVA
Robert Shaler	TVA
Mark Gowin	TVA
Kevin Groom	TVA
Fred Nilsen	TVA
Mike Taggins	TVA

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RidsRgn2MailCenter Resource  
RidsNrrDorl Resource  
RidsACRS\_MailCTR Resource

**ADAMS Accession Nos.:**

**Package: ML22319A219**

**Meeting Notice: ML22272A570**

**Meeting Summary: ML22319A195**

OFFICE	NRR/DORL/LPL2-2/PM	NRR/DORL/LPL2-2/LA	NRR/DEX/EMIB
NAME	MMahoney	RButler	SBailey
DATE	11/14/2022	11/17/2022	12/02/2022
OFFICE	NRR/DORL/LPL2-2/BC		
NAME	DWrona		
DATE	12/02/2022		

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