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SUBJECT: Requests approval of BFP Unit 3 Risk-Informed ISI (RI-ISI) program, per 10CFR50.55(a)(3)(i) & GL 88-01. Encl RI-ISI program is alternative to current ASME Section XI ISI requirements for Code class 1, 2 & 3 piping.

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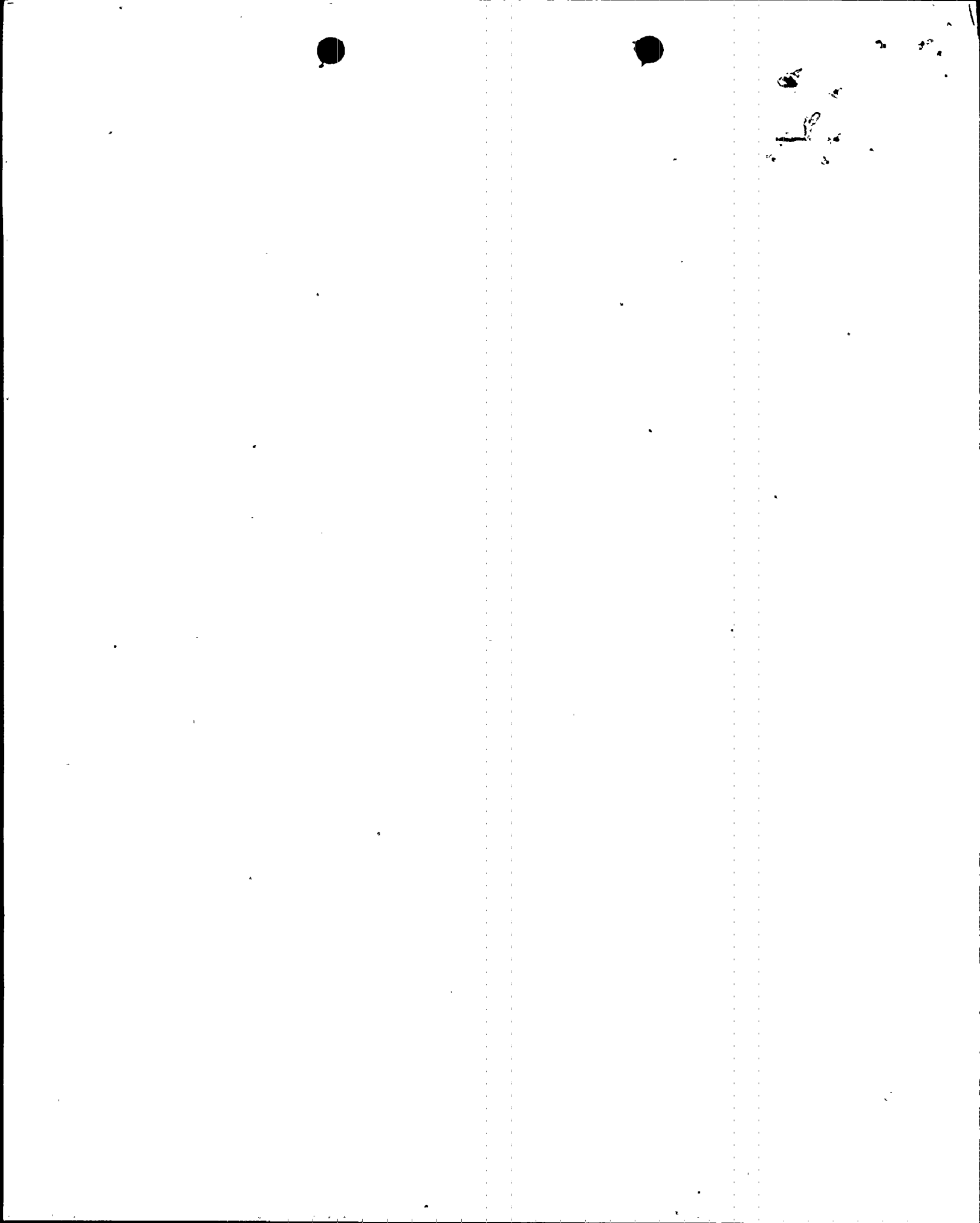
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Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609

April 23, 1999

10 CFR 50.55a(a)(3)(i)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket No. 50-296

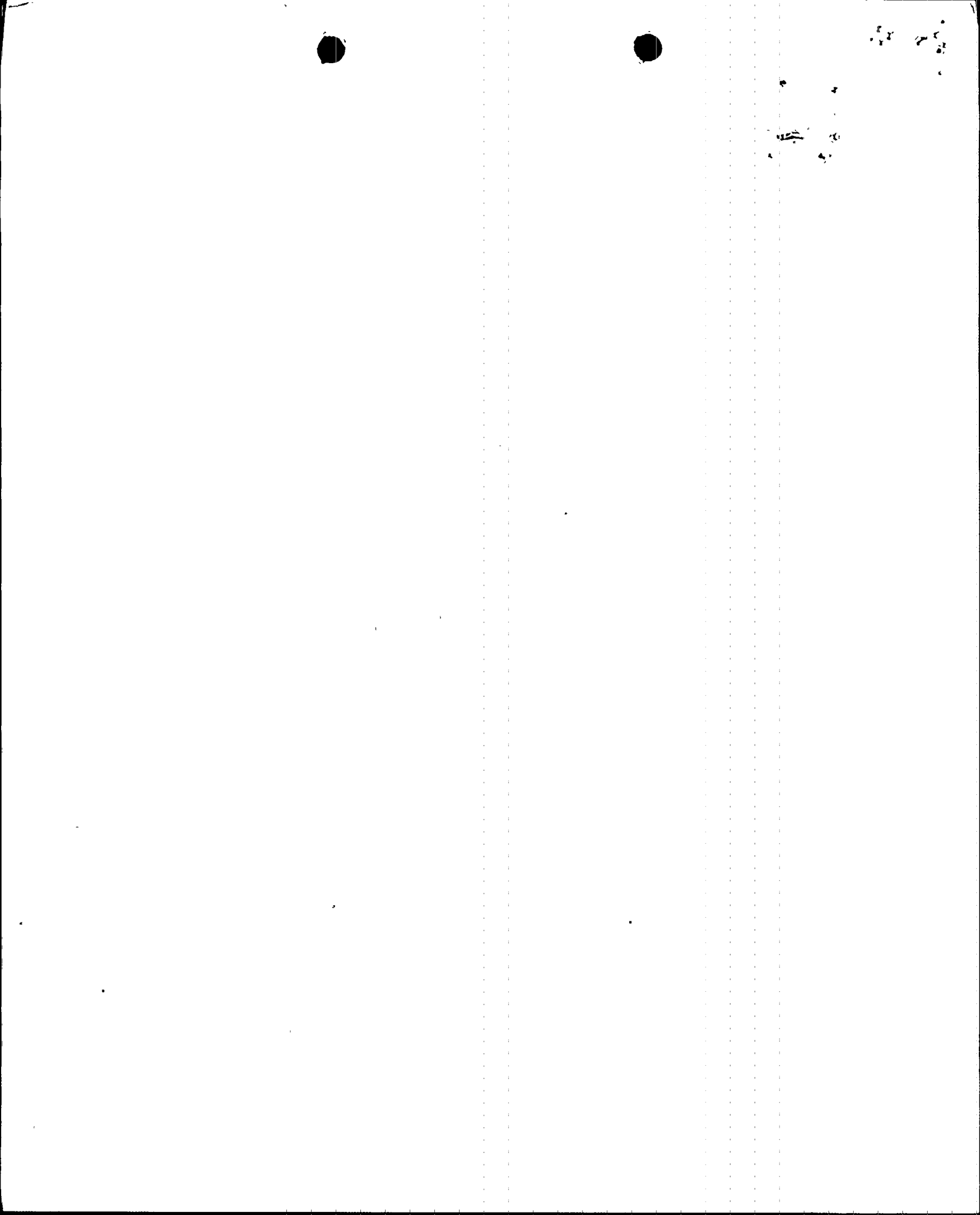
BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 3 - REQUEST FOR APPROVAL OF THE BFN AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) SECTION XI ALTERNATE INSERVICE INSPECTION PROGRAM - RISK INFORMED INSERVICE INSPECTION (RI-ISI) AND COST BENEFICIAL LICENSING ACTION (CBLA) 99-01

Pursuant to 10 CFR 50.55a(a)(3)(i) and Generic Letter (GL) 88-01, TVA requests NRC to review and approve the BFN Unit 3 RI-ISI program. The enclosed RI-ISI program is an alternative to current ASME Section XI inservice inspection requirements for Code class 1, 2, and 3 piping. The program also provides an alternative to the inspection requirements of Intergranular Stress Corrosion Cracking (IGSCC) Category "A" welds. This program was developed in accordance with the Westinghouse Owners Group Topical Report WCAP-14572, Revision 1, as modified by the September 30, 1998, letter to the Commission from the Westinghouse Owners Group (with some deviations) and the guidance contained in GL 88-01.

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The program supports the conclusion that the proposed alternative provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i). Additional supporting documentation is available at the BFN offices for your review. Quality is enhanced because the required inspections are specifically tailored to an identified failure mechanism and, where applicable, utilize existing programs with specified performance

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standards. Safety of the plant is unchanged. There is no impact on current safety margins from the implementation of this program.

BFN Unit 3 is in the first period of the Second Ten-Year Inspection Interval. The code of record for Unit 3 is the 1989 Edition (no addenda) of the ASME Boiler and Pressure Vessel Code, Section XI, Division 1 in accordance with 10 CFR 50.55a(g)(4). Additionally, in accordance with 10 CFR 50.55a(b)(2)(ii), the extent of examination for Examination Category B-J welds is in accordance with the 1974 Edition, Summer 1975 Addenda of ASME Section XI.

TVA's letter to NRC dated October 23, 1998, transmitted the BFN Unit 2 RI-ISI program. The program contains an alternative to the current ASME section XI inspection requirements for Code class 1, 2, and 3 piping. In addition, the RI-ISI program includes an alternative to the GL 88-01 augmented inspection requirements for IGSCC category (A, B, C, D, E, F, and G) welds. In that letter, TVA requested the NRC to consider the BFN Unit 2 RI-ISI as a pilot program. Approval was requested by February 26, 1999, to support implementation during the Unit 2 Cycle 10 refueling outage that began on April 11, 1999.

Since the Unit 2 RI-ISI program was not approved by the requested date, TVA has reevaluated the schedule for RI-ISI based on planned refueling outages. The BFN Unit 3 Cycle 9 refueling outage is the next scheduled outage (Spring 2000). Therefore, the NRC priority for review should be shifted from the BFN Unit 2 RI-ISI program submittal to the BFN Unit 3 RI-ISI program submittal in order to support RI-ISI implementation in the Spring of 2000.

On March 31, 1999, TVA met with the NRC staff to discuss the Unit 3 RI-ISI program submittal, specifically, the level of detail (i.e., content and format) contained in the proposed Unit 3 RI-ISI submittal. As discussed during the meeting, the Unit 3 RI-ISI program submittal is different from the Unit 2 RI-ISI program submittal because the Unit 3 program contains alternate inspection requirements for the augmented GL 88-01 IGSCC Category "A" welds only. Whereas, the Unit 2 RI-ISI program contains inspection requirements for each IGSCC weld category. TVA informed the staff of plans to submit a Unit 3 augmented RI-ISI program that includes alternate inspection requirements for the remaining Unit 3 IGSCC welds (i.e., B, C, D, E, F, and G). TVA expects to submit the Unit 3 augmented RI-ISI program for the remaining Unit 3 IGSCC welds by Fall of 1999.



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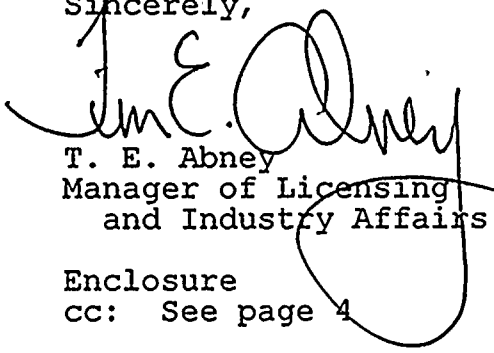
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TVA previously requested the Unit 2 RI-ISI program to be considered as a pilot. TVA reiterates that request for the Unit 3 RI-ISI program. In accordance with 10 CFR Part 170.11(b)(1), TVA requests an exemption from the 10 CFR Part 170 fee requirements for the review of this submittal and the review of responses to NRC requests for additional information.

TVA requests NRC approval of the Unit 3 RI-ISI program by August 31, 1999, but no later than December 31, 1999, in order to support implementation in the Unit 3 Cycle 9 refueling outage. The refueling outage is currently scheduled to begin in Spring 2000. Approval by August 31, 1999, will allow TVA to finalize resource planning for the Spring 2000 outage and recruit additional inspectors if the program is not approved. TVA also requests that the NRC priority for review be shifted from the BFN Unit 2 RI-ISI program submittal to the Unit 3 program submittal. Approval of the Unit 2 RI-ISI program can be delayed until approval of the enclosed Unit 3 program.

It should also be noted that TVA considers implementation of the BFN RI-ISI program to be a Cost Beneficial Licensing Action. TVA estimates that approval of this RI-ISI program submittal could save approximately \$2,000,000 during the remaining Unit 3 inservice inspection intervals. There are no commitments contained in this letter. If you have any questions, please telephone me at (256) 729-2636.

Sincerely,



T. E. Abney
Manager of Licensing
and Industry Affairs

Enclosure
cc: See page 4



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Enclosure

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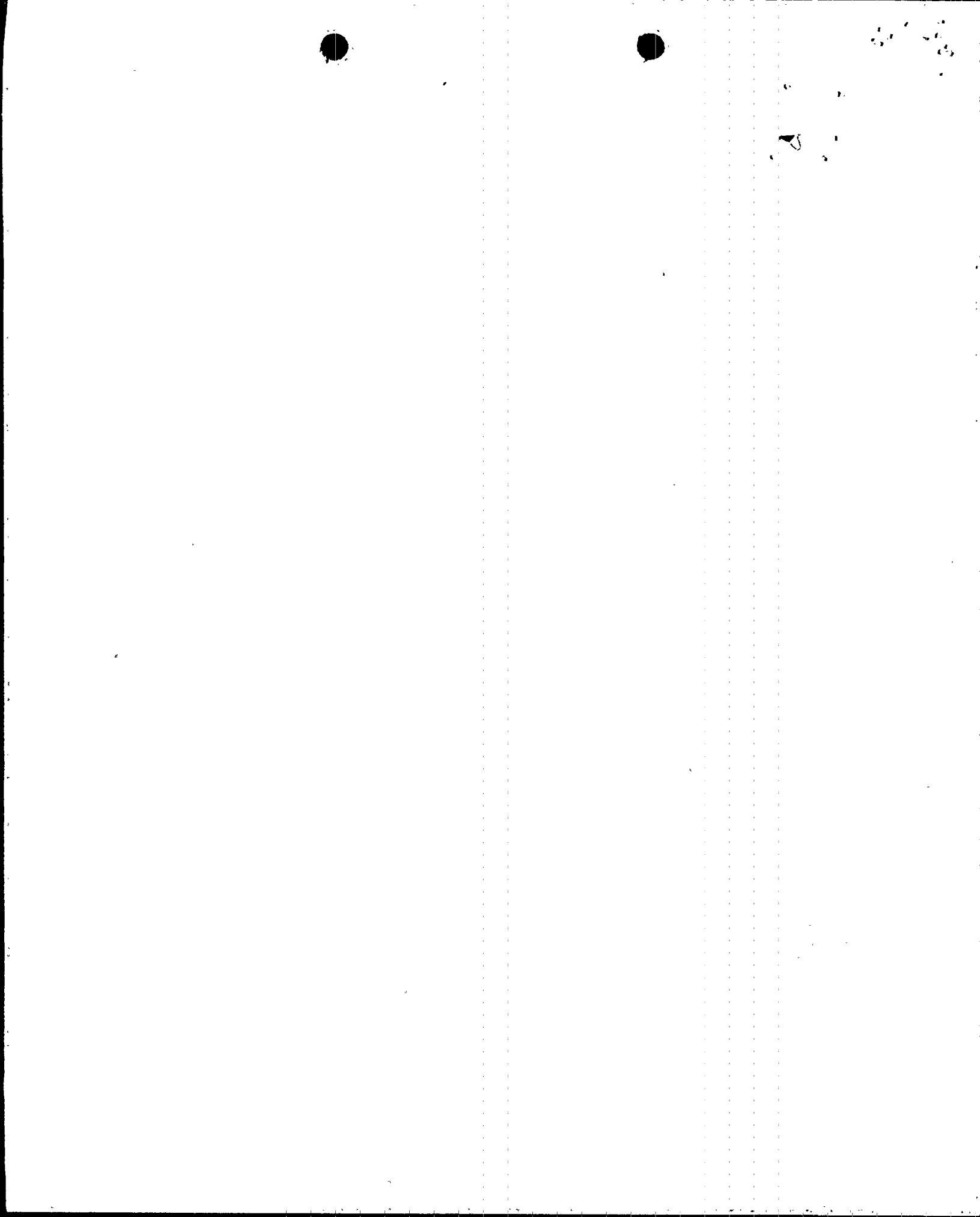
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Enclosure

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ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN),
UNIT 3

REQUEST FOR APPROVAL OF THE BFN AMERICAN SOCIETY OF MECHANICAL
ENGINEERS (ASME) SECTION XI ALTERNATE INSERVICE INSPECTION PROGRAM
RISK INFORMED INSERVICE INSPECTION

(See the attached submittal)

