

May 6, 2004

U.S. Nuclear Regulatory Commission
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Gentlemen:

In the Matter of) Docket No. 50-259
Tennessee Valley Authority)

**BROWNS FERRY NUCLEAR PLANT (BFN) UNIT 1 - UPDATE TO TVA
RESPONSE TO NRC BULLETIN NO. 93-02, DEBRIS PLUGGING OF
EMERGENCY CORE COOLING SUCTION STRAINERS**

This letter updates TVA's response to NRC Bulletin 93-02, "Debris Plugging of Emergency Core Cooling Suction Strainers," for BFN Unit 1.

On May 11, 1993, NRC issued NRC Bulletin No. 93-02, which notified licensees of the potential loss of net positive suction head (NPSH) for the Emergency Core Cooling System (ECCS), and directed the licensees to take the following actions:

1. Identify fibrous air filters or temporary sources of fibrous material, not designed to withstand a Loss of Coolant Accident (LOCA), installed or stored in the primary containment;
2. Take any immediate compensatory measures required to assure the functional capability of the ECCS; and
3. Take prompt action to remove any such material.

By letter dated May 23, 1993, TVA indicated that BFN Unit 1 was in an extended outage and committed to perform the requested actions prior to restart of that unit (Reference 1). As committed, TVA will inspect the BFN Unit 1 drywell, remove any identified temporary fibrous material, and provide the NRC with a report confirming

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completion of these activities prior to restart of BFN Unit 1.

In its May 23, 1993 response, TVA also committed to evaluate the BFN Unit 1 containment for permanent fibrous material prior to its restart. TVA has completed its evaluation of permanent fibrous material in the BFN Unit 1 containment, and considers this commitment closed.

TVA reviewed the drywell design and performed a walkdown to identify sources of fibrous material in the drywell. The only fibrous materials permanently installed in the drywell are insulation materials located in the drywell penetrations. TVA has determined that at restart, twelve BFN Unit 1 penetrations will have permanently installed insulation consisting of asbestos, calcium silicate and/or fiberglass material. This insulation will be located in the penetrations between the pipe and the penetration sleeve.

As described in its response to NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors" (Reference 2), TVA has conservatively analyzed the BFN Unit 1 replacement ECCS suction strainers to account for fibrous debris loading, including consideration of the permanently installed insulation in the piping penetrations.

The NRC issued Bulletin 93-02, Supplement 1 on February 18, 1994, requesting that licensees take interim actions to enhance the capability to prevent or mitigate loss of the ECCS following a LOCA due to strainer clogging. TVA responded to Bulletin 93-02, Supplement 1 for all three BFN units and notified NRC of the completion of its commitments in References 3-5. No additional actions are required prior to Unit 1 restart to address Supplement 1 of the Bulletin.

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There are no new regulatory commitments associated with this submittal. If you have any questions about this submittal, please contact me at (256) 729-2636.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 6, 2004.

Sincerely,

Original signed by:

T. E. Abney
Manager of Licensing
and Industry Affairs

References:

1. TVA letter, P. Salas to NRC, "Browns Ferry Nuclear Plant (BFN) - NRC Bulletin No. 93-02, Debris Plugging of Emergency Core Cooling Suction Strainers," May 23, 1993.
2. TVA letter, T.E. Abney to NRC, "Browns Ferry Nuclear Plant (BFN) - NRC Bulletin No. 96-03, Potential Plugging of Emergency Core Cooling Suction (ECCS) Strainers by Debris in Boiling Water Reactors (TAC Nos. M96135, M96136, M96137)," July 25, 1997.
3. TVA letter, P. Salas to NRC, "Browns Ferry Nuclear Plant (BFN) - NRC Bulletin 93-02, Supplement 1 - Debris Plugging of Emergency Core Cooling System (ECCS) Suction Strainers," April 18, 1994.
4. TVA letter, P. Salas to NRC, "Browns Ferry Nuclear Plant (BFN) - NRC Bulletin 93-02, Supplement 1 - Debris Plugging of Emergency Core Cooling System (ECCS) Suction Strainers - Commitment Completion [TAC Nos. M89277, M89278, and M89279]," July 29, 1994.
5. TVA letter, P. Salas to NRC, "Browns Ferry Nuclear Plant (BFN) Unit 2 - Supplemental Response To NRC Bulletin 93-02, Supplement 1 - Debris Plugging Of Emergency Core Cooling System (ECCS) Suction Strainers," December 1, 1994.

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