

August 31, 2004

Mr. Karl W. Singer
Chief Nuclear Officer and
Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2 AND 3 LICENSE RENEWAL
APPLICATION (TAC NOS. MC1704, MC1705 AND MC1706)

Dear Mr. Singer:

By letter dated December 31, 2003, Tennessee Valley Authority (TVA) submitted an application pursuant to 10 CFR Part 54, to renew the operating licenses for the Browns Ferry Nuclear Plant, Units 1, 2 and 3, for review by the U.S. Nuclear Regulatory Commission (NRC). The NRC staff is reviewing the information contained in the license renewal application (LRA) and has identified areas where additional information is needed to complete the review. Specifically, the enclosed requests for additional information (RAIs) are related to the scoping and screening methodology, plant level scoping results, and systems scoping and screening results for mechanical systems, Sections 2.1, 2.2, and 2.3 respectively. Drafted forms of these RAIs were discussed with TVA staff on a telephone conference call on April 14, 2004.

Based on discussions with Ken Brune of your staff, a mutually agreeable date for your response to the RAIs is within 30 days of the date of this letter. If you have any questions regarding this letter or if circumstances result in your need to revise the response date, please contact me at (301) 415-1594 or by e-mail at yks@nrc.gov.

Sincerely,

/RA/

Yaira K. Diaz Sanabria, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

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

Enclosure: As stated

cc w/encl: See next page

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License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

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

Enclosure: As stated

cc w/encl: See next page

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**REQUEST FOR ADDITIONAL INFORMATION (RAI) RELATED TO SCOPING AND
SCREENING RESULTS: SECTIONS 2.1, 2.2, AND 2.3 OF
BROWNS FERRY UNITS 1, 2, AND 3
BROWNS FERRY NUCLEAR PLANT LICENSE RENEWAL APPLICATION**

2.3 SCOPING AND SCREENING RESULTS: MECHANICAL SYSTEMS

RAI 2.3-1

Many of the tables in LRA Section 2.3 list "fittings" as a component type subject to an aging management review (AMR). The term fittings typically refers to components such as elbows, tees, unions, reducers, caps, flanges, etc., which are an integral part of piping systems. LRA Section 2.3.5 (page 2.3-127) lists other components which fall under the component type "fittings," but does not list the above components. Confirm that components such as elbows, tees, unions, reducers, caps, flanges, quick disconnects, thermal sleeves, aux heads, drains, and the like are considered as part of the component type "fittings" in the LRA tables, or state if they are considered as part of another listed component type.

RAI 2.3-2

Browns Ferry Nuclear Plant (BFNP) LRA Section 2.1.7.9, Group (c) states that "oil, grease, and component filters" are short lived and are periodically replaced. It further states that various plant procedures are used in the replacement of oil, grease, and component filters that are in scope for license renewal. In the process of verifying the results of the above applicant's methodology, the staff raised the following questions.

Because BFNP LRA uses "aging management review" boundary drawings instead of scoping boundary drawings, the components that are in scope but not subject to an AMR are not highlighted on the drawings. Therefore, the staff is unable to determine, for mechanical systems, if all in scope oil, grease, and component filters have been identified in accordance with 10 CFR 54.4. Additionally, the staff cannot determine whether plant procedures exist and are adequate for every in scope "oil, grease, and component filters" that is not subject to an AMR. For example, the cranes system is within the scope of license renewal in accordance with 10 CFR 54.4(a)(2); however, filters are not listed in LRA Table 2.3.3.34 as being subject to an AMR. Additionally, no drawings are provided for this system. Therefore, the staff cannot determine if this system contains any in scope oil, grease, and component filters, and that the procedures are adequate for this system's oil, grease, and component filters.

Because the boundary drawings are generic for all mechanical systems in the BFNP LRA, the following RAI applies to all mechanical systems.

1. Verify that all the in scope oil, grease, and component filters are identified in the license renewal boundary drawings. If not, list those in scope oil, grease, and component filters that are not identified in the drawings.
2. Identify the plant procedures that are used in the replacement of every in scope oil, grease, and filter that is not subject to an AMR to demonstrate that the oil, grease, or filter is replaced on a "periodic basis" and identify the specific period.

Enclosure

3. Identify those in scope oil, grease, and component filters without proper plant procedures that are subject to an AMR.

Section 2.3.3.2 Fuel Oil System

RAI 2.3.3.2-1

The diesel generator low level radioactive waste (LLRW) fuel oil system and the diesel-driven fire pump LLRW fuel oil system are not highlighted on license renewal drawing 0-47E840-2-LR as being in scope and subject to an AMR. The UFSAR does not describe either of these two subsystems. Therefore, the staff cannot determine if these systems have intended functions that would satisfy any of the criteria in 10 CFR 54.4(a). Provide the design functions and associated licensing basis to prove that these portions of the fuel oil system can be excluded from the scope of license renewal and subject to an AMR.

RAI 2.3.3.2-2

Tank drain valve 0-DRV-750 and associated piping and fittings are not highlighted on license renewal drawing 0-47E840-2-LR (location F8) as being within the scope of license renewal. Failure of this piping could affect the upstream valve (seismic loadings) and drain the storage tank. The license renewal drawing does not show safety class changes or seismic class changes. Therefore, the staff cannot determine, based on the information provided, whether this portion of piping up to and including valve 0-DRV-750 should be in scope. Justify the exclusion of valve 0-DRV-750 and associated piping and fittings from the scope of license renewal.

Section 2.3.3.3 Residual Heat Removal Service Water System

RAI 2.3.3.3-1

License renewal drawing 0-47E851-4-LR provides the drainage flow diagram (identified as System No. 40 in the drawing title block). Most of the piping and valves on the drawing are identified with unique component identifiers (UNIDs) for System 40. However, the piping shown in red does not identify any UNID for the pumps or piping. Identify which components on this license renewal drawing are part of the residual heat removal service water system (System 023).

Section 2.3.3.4 Raw Cooling Water System

RAI 2.3.3.4-1

The shell of water chillers 1A and 1B are not shown as being subject to an AMR on license renewal drawing 1-47E844-2-LR (location E7). Accordingly, heat exchangers are not listed as a component type subject to an AMR in LRA Table 2.3.3.4. However, the shell of these chillers serves as the pressure boundary and structural support for the attached raw cooling water piping which is subject to an AMR. Justify the exclusion of these chillers from being subject to an AMR.

Section 2.3.3.5 Raw Service Water System

RAI 2.3.3.5-1

Normally open, hand-operated butterfly valve 1-25-703 is shown as being subject to an AMR on license renewal drawing 1-47E850-1-LR (location G7). However, the upstream raw service water piping, valves, and interconnected components are not highlighted on this drawing as being within the scope of license renewal and subject to an AMR. Similarly, license renewal drawings 2-47E850-1-LR (location G8) and 3-47E850-1-LR (location H6, H7) contain similar piping and valve arrangements for Units 2 and 3, respectively, where the discharge of raw service water pumps interface with the fire service system. Provide the basis for using a normally open, hand-operated valve as a boundary from the upstream raw service water system piping and components. Justify the exclusion of these components from the scope of license renewal and being subject to an AMR.

Section 2.3.3.13 Station Drainage System

RAI 2.3.3.13-1

A 3-inch roof drain (roof elevation 667.0 at location D3) is not shown as being within the scope of license renewal and subject to an AMR on license renewal drawing 0-47E851-1-LR. This drain provides a pressure boundary function between the standby gas treatment system and the off gas system, and therefore, should be within the scope of license renewal. Additionally, the drain is passive and long lived, and therefore, should be subject to an AMR. It is noted that the 4-inch roof drains are highlighted as being subject to an AMR at locations B2-B12 of license renewal drawing 0-47E852-3-LR. Justify the exclusion of the 3-inch roof drain from the scope of license renewal and from being subject to an AMR.

Section 2.3.3.15 Building Heat System

RAI 2.3.3.15-1

Note 3 of license renewal drawing 0-47E866-2-LR states that the boundary ends at the reactor building wall. This note is referred to in a number of locations on this drawing (such as locations J1, 2, 4, 5, 7, 8) where the building heat piping and associated components are not in scope and not subject to an AMR. However, a similar note at valves 1-1029, 1-1030, 2-1318, 2-1319, 3-1386, and 3-1387 (locations I5, 6, 7, 8) is not provided on license renewal drawing 0-47E866-1-LR. These valves are shown as normally open. Thus, the piping on both sides of these valves appear to provide a secondary containment boundary as described in LRA Section 2.3.3.15 and, therefore, should be subject to an AMR. Provide the basis for these valves, which are shown as being subject to an AMR, as being the boundary of piping and components which are not subject to an AMR.

Section 2.3.3.18 Standby Liquid Control System

RAI 2.3.3.18-1

Component electric heater (HTR), located inside the standby liquid control tank, is shown on license renewal drawings 1-47E854-1-LR, 2-47E854-1-LR and 3-47E854-1-LR as being subject to an AMR. LRA Section 2.3.5 lists this component UNID (HTR) in three different component types fittings, heaters, and tanks. Identify which component type in LRA Table 2.3.3.18 includes the electric heater.

Section 2.3.3.20 Emergency Equipment Cooling Water System

RAI 2.3.3.20-1

The emergency equipment cooling water system is shown on license renewal drawings 1-47E859-1-LR (at locations C5 and C6), 2-47E859-1-LR (at locations A4 and A7), and 3-47E859-1-LR (at locations A5 and A7). The cooling water return piping from the safety-related components terminates at locations designated as “yard drainage.” LRA Table 3.3.2.20 states that buried carbon and low alloy steel piping has been evaluated for aging management. 10 CFR 52.21 requires that components subject to an AMR must be identified. However, neither the LRA nor the associated drawings adequately identifies the extent of buried piping subject to an AMR. Identify the extent of buried emergency equipment cooling water piping that is subject to an AMR and provide an appropriately marked license renewal drawing, or identify a specific structure where the piping subject to an AMR terminates. Justify the exclusion of any buried piping or structures between the emergency equipment cooling water system and the final discharge structure from the scope of license renewal and from being subject to an AMR.

Section 2.3.3.22 Reactor Building Closed Cooling Water System

RAI 2.3.3.22-1

Combination air filter/pressure regulators and flow control valves for the drywell atmospheric cooling (units A5 and B5) are identified on license renewal drawings 2-47E610-70-1-LR and 3-47E610-70-1-LR as being within the scope of license renewal and subject to an AMR. The flow control valves and combination air filter/pressure regulators for the drywell atmospheric cooling units A4 and B4, A3 and B3, A2 and B2, A1 and B1 are not identified as being within the scope of license renewal and subject to an AMR. There is insufficient information in the UFSAR to determine whether the flow control valves and combination air filter/pressure regulators for the drywell atmospheric cooling units listed above can be excluded from the scope of license renewal and from being subject to an AMR. Justify the exclusion of the flow control valves and combination air filter/pressure regulators for the drywell atmospheric cooling units A4 and B4, A3 and B3, A2 and B2, A1 and B1 components from the scope of license renewal and from being subject to an AMR.

RAI 2.3.3.22-2

Two valves FCV 70-24 and FCV 70-34 are shown on license renewal drawings 2-47E610-70-1 and 3-47E822-1. The operator for these valves is shown on these license renewal drawings as being within the scope of license renewal and subject to an AMR. However, the operator for these same valves is shown as not within the scope of license renewal and subject to an AMR on license renewal drawings 3-47E610-70-1, 1-47E822-1-LR and 2-47E822-1-LR. Justify the exclusion of the operators for FCV 70-24 and FCV 70-34 from the scope of license renewal and from being subject to an AMR.

RAI 2.3.3.22-3

The applicant stated that the operators for the dampers are within the scope of license renewal as a pressure boundary for the control air system (System 032). With regard to this statement, the staff has the following additional questions:

- a. The UNIDs assigned to various components, in particular, the dampers and the operators for the dampers, are for System 70 which is the reactor building closed cooling water system. Explain what is meant by the statement, “the operators for the dampers are in scope as a pressure boundary for the control air system (System 032).” Does this statement mean that the operators are evaluated in the control air system? If so, is this statement true for other systems?
- b. Since the operators are highlighted/colored in red on license renewal drawings 2-47E610-70-1-LR and 3-47E610-70-1-LR, does that imply that the operators are subject to an AMR? If so, where in the LRA are the operators listed as components that are subject to an AMR?

Section 2.3.3.27 Fuel Handling and Storage System

RAI 2.3.3.27-1

Section 2.3.3.27 of the LRA states that the portions of the fuel handling and storage system that contain components subject to an AMR are the fuel preparation machines, refueling platform (assembly rails and the main fuel grapple), and the bolting and fasteners associated with the refueling platform and fuel preparation machines. LRA Table 2.3.3.27 lists the components associated with the fuel handling and storage system that are subject to an AMR. However, no drawings are provided for this system. BFNP UFSAR Table 10.4-1, “Tools and Servicing Equipment,” lists fuel servicing equipment, including general purpose grapple, channel transfer grapple, fuel inspection feature and new fuel inspection stand, but none of these are referenced in LRA Section 2.3.3.27. There is insufficient information for the staff to determine whether these components are within the scope of license renewal and subject to an AMR. Identify which of these components are within the scope of license renewal and subject to an AMR.

Section 2.3.3.28 Diesel Generator System

RAI 2.3.3.28-1

There are two components, i.e., governor and drain pan, in the diesel generator lube oil subsystem that are not subject to an AMR, as shown in license renewal drawings 0-47E861-5-LR through 0-47E861-8-LR and 3-47E861-5-LR through 3-47E861-8-LR. However, the piping into and out of these components are subject to an AMR, but not the components themselves. Justify the exclusion of these components from the scope of license renewal and from being subject to an AMR.

Section 2.3.3.31 Radiation Monitoring System

RAI 2.3.3.31-1

The following monitors are shown as being subject to an AMR:

- Gas monitors on license renewal drawings 0-47E610-90-2-LR at locations B7, F6, and F8
- Residual heat removal heat exchanger A & C service water discharge radiation monitor on license renewal drawings 1-47E610-90-3-LR, 2-47E610-90-3-LR and 3-47E610-90-3-LR at locations B7 and C7
- Residual heat removal heat exchanger B & D service water discharge radiation monitor on license renewal drawings 1-47E610-90-3-LR, 2-47E610-90-3-LR and 3-47E610-90-3-LR at locations G4 and G5
- Raw cooling water radiation monitor on license drawings 1-47E610-90-3-LR, 2-47E610-90-3-LR and 3-47E610-90-3-LR at location E7
- Reactor building closed cooling water radiation monitor on license renewal drawing 1-47E610-90-3-LR, 2-47E610-90-3-LR and 3-47E610-90-3-LR at location G7. The monitor housing performs a pressure boundary intended function. However, the housing is not listed as a component type subject to an AMR in LRA Table 2.3.3.31. LRA Section 2.3.5 does not include housing as a part of any component group. Clarify if housings are considered to be part of a component group already listed in Table 2.3.3.31.

Section 2.3.3.34 Cranes System

RAI 2.3.3.34-1

LRA Section 2.1.2.2, "Overhead Handling System," refers to cranes, monorails, hoists, and mobile A-frames. However, mobile A-frames are not mentioned in LRA Section 2.3.3.34 or in the UFSAR. LRA Section 2.3.3.34 states that the cranes system includes numerous plant load-handling devices that are used for maintenance of selected plant components. LRA Table 2.3.3.34 lists the components associated with the cranes system that are subject to an AMR. However, no drawings are provided for this system. There is insufficient information for the staff

to determine which cranes are in scope in accordance with 10 CFR 54.4(a)(2). Indicate which cranes are within the scope of license renewal and subject to an AMR, and whether the mobile A-frames are within the scope of license renewal.

Section 2.3.4.4 Heater Drains and Vents System

RAI 2.3.4.4-1

Pressure reducing valves PCV-1-151, 153, 166, and 167 are highlighted as being subject to an AMR on license renewal drawing 2-47E801-2-LR (location B-3, B-4). However, the piping downstream of these pressure reducing valves is not within the scope of license renewal. Likewise, a similar arrangement for Unit 3 is shown on license renewal drawing 3-47E801-2-LR (location B-3, B-4). Pressure reducing valves typically do not provide isolation capability if the downstream piping was to fail. Failure of the downstream piping could affect the intended function of the heater drains and vents system that is required to establish the main steam isolation valve (MSIV) leakage pathway to the condenser per LRA Section 2.3.4.4. Therefore, the piping downstream should be in scope in accordance with 10 CFR 54.4(a)(2). Justify the exclusion of the piping downstream of valves PCV-1-151, 153, 166, and 167 from being within the scope of license renewal and subject to an AMR.

RAI 2.3.4.4-2

Check valves 742 and 744 are highlighted on license renewal drawing 2-47E801-2-LR (location C2) as being subject to an AMR. However, the piping downstream of these check valves are not within the scope of license renewal. Likewise, a similar arrangement for BFNP Unit 3 is shown on license renewal drawing 3-47E801-2-LR (location C2). Failure of the downstream piping would affect the intended function of the heater drains and vents system that is required to establish MSIV leakage pathway to the condenser per LRA Section 2.3.4.4 and therefore should be in scope in accordance with 10 CFR 54.4(a)(2). Furthermore, the check valve orientation as shown on these drawings will not prevent flow to the downstream piping in the event of a failure. Justify the exclusion of the piping downstream of check valves 742 and 744 from being within the scope of license renewal and subject to an AMR.

Section 2.3.4.6 Condenser Circulating Water System

RAI 2.3.4.6-1

LRA Section 2.3.4.6 states that the condenser circulating water (CCW) system includes a loop in the discharge conduit containing a vacuum breaker valve. The valve prevents the backflow of heated water from the cooling tower warm water channel into the intake channel (fore-bay) that serves as an ultimate heat sink intended function. If the level in the warm water channel exceeds that in the fore-bay, backflow could occur upon loss of offsite power with a subsequent trip of the CCW pumps. LRA Section 2.3.4.6 also states that the condenser circulating water system contains components that are within the scope of license renewal in accordance with both 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2), and that the components subject to an AMR extend in the discharge vacuum breaking piping from the discharge conduit to an atmospheric vent. Additionally, UFSAR Section 11.6.4 states that “a vacuum breaking system with remote manual control to break vacuum on the vacuum loop is a redundant seismic Class 1 engineered safeguard.”

The above mentioned portion of the CCW system for Unit 1 are highlighted entirely in red (i.e., within the scope of license renewal in accordance with 10 CFR 54.4(a)(1)) on license renewal drawing 1-47E831-3. However, the corresponding portions of the CCW system for Unit 2 are partially highlighted in blue (i.e., within the scope of license renewal in accordance with 10 CFR 54.4(a)(2)) and partially highlighted in black (i.e., not in scope) on license renewal drawings 2-47E831-3. The corresponding portions of the CCW system for Unit 3 are highlighted on drawing 3-47E831-3 the same way as for Unit 2.

Justify why the portion of the CCW system in the vacuum breaking piping from the discharge conduit to the atmospheric vent has been highlighted differently for Units 2 and 3 than for Unit 1, and explain why the vacuum breaker valves, but not the associated 12-inch piping and fittings in the vacuum loop in the Unit 2 and 3 systems, are considered within scope in accordance with 10 CFR 54.4(a)(1).

RAI 2.3.4.6-2

LRA Table 2.3.4.6 lists piping, valves, fittings, and bolting as some of the component types that are subject to an AMR. However, the only intended function listed for these component types is structural support (bolting has the additional intended function of mechanical closure). For the vacuum breaking system to perform its intended function when required, it would appear that the pressure boundary of the vacuum breaking loop, from the discharge conduit to the atmospheric vent, would need to remain intact. Therefore, the vacuum breaker valve bodies and associated 12-inch piping, fittings, and bolting which the vacuum breaking loop comprises should have the intended function of pressure boundary. Justify why the intended function of pressure boundary is not included in LRA Table 2.3.4.6 for the above mentioned components.

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