

October 18, 2004

10 CFR 54

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop: OWFN P1-35
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of)	Docket Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 LICENSE
RENEWAL APPLICATION - RESPONSE TO NRC REQUEST FOR ADDITIONAL
INFORMATION (RAI) (TAC NOS. MC1704, MC1705, AND MC1706)**

By letter dated December 31, 2003, the Tennessee Valley Authority (TVA) submitted, for NRC review, an application pursuant to 10 CFR 54, to renew the operating licenses for Browns Ferry Nuclear Plant, Units 1, 2, and 3. In a phone discussion between the NRC and TVA, on 9-24-2004, additional information was requested by the NRC relating to the RAI responses sent to NRC on September 3, 2004.

The specific items are from areas requiring additional information after reviewing responses from TVA's letter dated September 3, 2004, on Scoping and Screening Audit Inspection: Civil, Electrical, and Mechanical Systems, respectively.

The enclosure to this letter contains the specific NRC requests for additional information and the corresponding TVA responses.

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If you have any questions regarding this information,
please contact Ken Brune, Browns Ferry License Renewal
Project Manager, at (423) 751-8421.

I declare under penalty of perjury that the forgoing is
true and correct. Executed on this 18th day of October,
2004.

Sincerely,

Original signed by:

T. E. Abney
Manager of Licensing
and Industry Affairs

Enclosure:
cc: See page 3

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Enclosure

cc (Enclosure):

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GLS:BAB

Enclosure

cc (Enclosure):

- A. S. Bhatnagar, LP 6-C
- K. A. Brune, LP 4F-C
- J. C. Fornicola, LP 6A-C
- D. F. Helms, LP 6A-C
- F. C. Mashburn, BR 4X-C
- R. G. Jones, NAB 1A-BFN
- K. L. Krueger, POB 2C-BFN
- R. F. Marks, Jr., PAB 1A-BFN
- J. R. Rupert, NAB 1F-BFN
- K. W. Singer, LP 6A-C
- M. D. Skaggs, PAB 1E-BFN
- E. J. Vigluicci, ET 11A-K
- NSRB Support, LP 5M-C
- EDMS, WT CA-K

s: lic/submit/subs/BFN LR ADDITIONAL INFO ON SS RAI RESPONSES(TVA LTR 9-3-04).doc

ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3
LICENSE RENEWAL APPLICATION (LRA) ,

RESPONSE TO NRC VERBAL REQUEST FOR ADDITIONAL INFORMATION
(RAI) REQUIRED AFTER REVIEW OF TVA LETTER DATED
SEPTEMBER 3, 2004 ON SCOPING AND SCREENING AUDIT RESPONSES.

(SEE ATTACHED)

**TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3
LICENSE RENEWAL APPLICATION (LRA),**

**RESPONSE TO NRC VERBAL REQUEST FOR ADDITIONAL INFORMATION
(RAI) REQUIRED AFTER REVIEW OF TVA LETTER DATED
SEPTEMBER 3, 2004 ON SCOPING AND SCREENING AUDIT RESPONSES.**

In a telephone discussion between NRC and TVA on September 24, 2004 additional information was requested by NRC relating to the RAI responses sent to NRC by letter dated September 3, 2004. The following provides a description of the NRC requests and the TVA responses.

Additional Information Request by NRC for RAI 2.1-1:

Provide additional information related to the safety related definition for 10 CFR 54.4(a) (1) (i) & (ii).

TVA Response to Additional Information Request for RAI 2.1-1:

Consistent with 10 CFR 54.4 (a) (1) (i), BFN utilized a definition of safety-related that included the integrity of the reactor coolant pressure boundary. Consistent with 10 CFR 54.4 (a) (1) (ii), BFN utilized a definition of safety-related that included the capability to shut down the reactor and maintain it in a safe shutdown condition.

Additional Information Request by NRC for RAI 2.1-2A.1:

Provide additional information related to anchors associated with piping qualified for pressure boundary retention associated with Secondary Containment Penetrations.

TVA Response to Additional Information Request by NRC for RAI 2.1-2A.1:

The nonsafety-related piping segments which support secondary containment are qualified to Seismic Class II pressure retention requirements. This qualification was performed to meet the CLB requirements. The CLB requirements for secondary containment are very conservative and will be reviewed and may be updated to remove any unnecessary conservatism. Currently piping, supports, and other components inside secondary containment which are required to maintain the structural

integrity of the Secondary Containment are in scope. Following the CLB review and possible updates, TVA will identify the piping, supports, and other components outside secondary containment required to maintain the structural integrity of the Secondary Containment. Identified piping, supports or other components will be added to the scope as needed. This will be completed prior to the period of extended operation.

Additional Information Request by NRC for RAI 2.1-2A.3:

Provide additional information related to methodology to be utilized to ensure that the liquid filled non-safety related piping up to the first equivalent anchor was captured.

TVA Response to Additional Information Request for RAI 2.1-2A.3:

In the initial RAI response, TVA committed to review the Seismic Class I piping boundaries and identify any additional piping segments and supports/equivalent anchors that need to be placed in the scope of license renewal. To accomplish this TVA will use the Seismic Class I qualification documentation to identify the non-safety related piping, components, and associated supports/equivalent anchors which are required for the qualification of the safety-related piping. Identified piping, supports/equivalent anchors, or other components will be added to the scope as needed. This will ensure that piping, supports/equivalent anchors, or other components up to the first seismic anchor past the safety/non-safety interface are included in scope.

Additional Information Request by NRC for RAI 2.1-2B:

Provide additional information on what physical work was being done by the DCN.

TVA Response to Additional Information Request for RAI 2.1-2B:

The DCN will replace the temperature switch connectors. The DCN will also seal conduits as required to ensure circuit integrity. This DCN, when completed, will ensure circuit qualification for moderate and low energy line breaks. Additionally, the circuits will remain qualified for 10 CFR 50.49 applications.

Additional Information Request by NRC for RAI 2.1-2C

Provide additional details concerning excluding components based on "Exposure Duration" at the Intake Pumping Station or the RHRSW Tunnel.

TVA Response to Additional Information Request for RAI 2.1-2C

TVA will not take credit for "Exposure Duration" to exclude components from the scope of 10 CFR 54.4 (a) (2) at the Intake Pumping Station or the RHRSW Tunnel.

Additional Information Request by NRC for RAI 2.1-3:

Provide additional information related to the Quality Assurance Program Attributes in Appendix A to address safety-related and nonsafety-related structures, systems, and components.

TVA Response to Additional Information Request for RAI 2.1-3:

Shown below, is a sentence contained in the TVA response to RAI 2.1-3 in TVA Letter to NRC, dated September 3, 2004:

"These elements are applicable to all aging management programs credited for license renewal."

Replace the above sentence with the following:

"These elements are applicable to all aging management programs credited for license renewal including programs for safety-related and nonsafety-related structures, systems, and components."