

From: Eva Brown
To: Abney, Timothy
Date: Monday, December 13, 2004 9:19AM
Subject: CLARIFICATION: EPU Review Standard and associated Topcial Reports

Tim,

I just wanted to follow-up on the conversations we had last Wednesday regarding the hierarchy of these EPU guidance documents; Review Standard for Extended Power Uprates, RS-001, Rev. 0 dated December 2003, and the General Electric, Generic Guidelines for General Electric Boiling Water Reactor Extended Power Uprate," February 1999 and 2000, (ELTR1 and ELTR2, respectively).

The standardized review guidance and acceptance criteria (applicable sections of 10 CFR 50) are collected and segregated by functional area in the RS-001. These acceptance criteria include General Design Criteria as enumerated in Appendix A to 10 CFR 50. Topical reports such as ELTR1 and ELTR2 are used as a vehicle to improve the efficiency of a licensing process by allowing the staff to review a methodology or proposal that will be used by multiple licensees and following approval, allowing the participating licensees to reference the approved report. The NRC-accepted ELTR1 and ELTR2 provide appropriate guidelines for the EPU applications, but do not provide the regulatory criteria for the safe operation of the facility. They describe a generic proposed methodology for evaluating whether design changes still meet applicable NRC requirements.

In Enclosure 12, TVA marked up the RS-001, Areas of Review Matrix. In many cases regulatory requirements were replaced by TVA with references to the ELTR methodology vice the regulatory acceptance criteria. If TVA believes that the acceptance criteria not be the applicable sections in 10 CFR 50 and Appendix A as originally indicated in the Review Standard, the NRC staff is looking for TVA's proposed regulatory acceptance criteria. This is consistent with the guidance in RS-001 which states for the acceptance review "[r]eview the information provided by the licensee...to confirm that the regulatory requirements and design basis are adequately characterized and addressed with respect to the proposed EPU."

The NRC staff's acceptance review RAIs are focused primarily on the adequacy of TVA's description of Browns Ferry's existing and proposed engineering design and licensing bases at the current and proposed power level. Question 1 requests that TVA supplement the submittals to better define the regulatory acceptance criteria used by TVA to determine that uprating the licensed power remained acceptable for Browns Ferry. The Browns Ferry EPU's are two among at least seven EPU's in house, on top of the other restart, license renewal, and outage related submittals for the nuclear industry. As Browns Ferry's design basis differs from the baseline in the review standard, a description of the Browns Ferry specific EPU acceptance criteria used by TVA greatly enhances the efficiency of the NRR staff's review.

During our conversation, you indicated that the TVA licensing basis and design basis was described in Appendix A to the FSAR, and you suggested we take a look. Based on our cursory review, that document may be a good starting point for TVA to address the NRC staff's questions regarding characterization of the criteria used. As for the feedwater heater analysis, the analysis itself is not needed at this time, however a detailed summary should be included.

Hopefully this clarifies your understanding of the hierarchy of documents and clarifies the guidance provided in RS-001 and ELTR1/2. If you have any additional questions, please feel free to give me or Margaret a call.

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