

January 31, 2005

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 - ANNUAL UPDATE (TAC NOS. MC1704, MC1705,
AND MC1706)**

By letter dated December 31, 2003, TVA submitted, for NRC review, an application pursuant to 10 CFR 54, to renew the operating licenses for the Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3.

TVA is required by 10 CFR 54.21(b) to report changes annually to the BFN current licensing basis that materially affect the contents of the LRA, including the Updated Final Safety Analysis Report supplement.

TVA has completed a review of the pertinent documentation and identified changes which materially affect the contents of the BFN LRA. The enclosure to this letter contains the changes to the BFN LRA.

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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 foregoing is true and correct. Executed on this 31st day of January, 2005.

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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(Via NRC Electronic Distribution)

Enclosure

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cc: continued page 4

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GLS:BAB

Enclosure

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- J. C. Fornicola, LP 6A-C
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- K. L. Krueger, POB 2C-BFN
- R. F. Marks, Jr., PAB 1A-BFN
- F. C. Mashburn, BR 4X-C
- N. M. Moon, LP 6A-C
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- NSRB Support, LP 5M-C
- EDMS, WT CA-K

s://BFN License Renewal Annual Update Letter TVA Response

ENCLOSURE

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

ANNUAL UPDATE

(SEE ATTACHED)

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

ANNUAL UPDATE

By letter dated December 31, 2003, TVA submitted, for NRC review, an application pursuant to 10 CFR 54, to renew the operating licenses for the Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3.

TVA is required by 10 CFR 54.21(b) to report changes annually to the BFN current licensing basis that materially affect the contents of the LRA, including the Updated Final Safety Analysis Report supplement.

Listed below are the changes which materially affect content of the BFN License Renewal Application.

RAW COOLING WATER SYSTEM (024)

Plant modification deleted carbon steel strainers. This deletes the following line items from Table 3.3.2.4 on page 3.3-90:

Table 3.3.2.4: Raw Cooling Water System (024) - Summary of Aging Management Evaluation

Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Program	NUREG - 1801 Vol. 2 Item	Table 1 Item	Notes
Strainers	PB	Carbon and Low Alloy Steel	Inside Air (external)	Loss of material due to general corrosion.	Systems Monitoring Program (B.2.1.39)	VII.I.1-b	3.3.1.5	A
Strainers	PB	Carbon and Low Alloy Steel	Raw Water (internal)	Loss of material due to galvanic corrosion.	Open-Cycle Cooling Water System Program (B.2.1.17)	VII.C1.6-a	None	H, 3
Strainers	PB	Carbon and Low Alloy Steel	Raw Water (internal)	Loss of material due to MIC, biofouling, general, crevice, and pitting corrosion.	Open-Cycle Cooling Water System Program (B.2.1.17)	VII.C1.6-a	3.3.1.17	A

HIGH PRESSURE FIRE PROTECTION SYSTEM (026)

Plant modification deleted components shown on drawing 3-47E850-8. Therefore, drawing 3-47E850-8-LR is no longer required as a license renewal boundary drawing. In the list of License Renewal Drawings in Section 2.3.3.6 on page 2.3-47, delete drawing 3-47E850-8-LR. There are no changes to the component types, materials, or environments for this system as a result of this change.

EMERGENCY EQUIPMENT COOLING WATER SYSTEM (EECW) (067)

The following component type/material/environment combinations were inadvertently omitted. The alternate fuel pool cooling lines had always been in scope for EECW, but it was overlooked that this alternate fuel pool cooling path is in a standby mode and so not filled with water until manually placed into service. This results in additional line items to Table 3.3.2.20 as shown below:

Table 3.3.2.20: Emergency Equipment Cooling Water System (067) - Summary of Aging Management Evaluation

Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Program	NUREG - 1801 Vol. 2 Item	Table 1 Item	Notes
Fittings	PB	Cast Iron and Cast Iron Alloy	Air/gas (internal)	Loss of material due to general corrosion	One-Time Inspection Program (B.2.1.29)	VII.C1.1-a	None	F, 1
Valves	PB	Copper Alloy	Air/gas (internal)	None	None	VII.C1.1-a	None	F, 3

REACTOR RECIRCULATION SYSTEM (068)

Plant modification deleted or abandoned components on drawing 3-47E817-2, and added components to drawing 3-47E844-2. Therefore, drawing 3-47E844-2-LR is a new Reactor Recirculation System boundary drawing and drawing 3-47E817-2-LR is no longer required. This affects the list of License Renewal Drawings in Section 2.3.1.4 on page 2.3-12. There are no changes to the component types, materials, or environments for this system as a result of these changes.

HIGH PRESSURE COOLANT INJECTION SYSTEM (073)

Plant walkdowns created new drawing 1-47E812-2. This drawing should be included in the list of License Renewal Drawings in Section 2.3.2.3 on page 2.3-23. Component types, materials, and environments for the in-scope components shown on drawing 1-47E812-2 are already included in Section 2.3.2.3, Section 3.2.2.1.3, and Table 3.2.2.3. Therefore, no changes to the component types, materials, or environments for the High Pressure Coolant Injection System are required.

LICENSE RENEWAL BOUNDARY DRAWINGS

License renewal boundary drawings have been maintained to reflect the current license renewal boundaries such that they are consistent with the LRA, RAI responses, change documentation, etc. Examples of some of the administrative changes made to the boundary drawings include:

- The reference drawing interface arrows for piping runs corrected as interfaces between drawings change
- Other valves and fittings added on drawings but to portion of the drawings that are not in license renewal boundary scope
- Specific BFN Unit ID's (i.e. valve numbers updated for a commodity that is already in scope)
- Leak off / drain valves removed from license renewal boundary drawings when found removed from system

These drawing changes do not materially affect the contents of the LRA.

B.2.1.32 ASME Section XI Subsection IWE Program

By letter dated March 1, 2004 (Accession No. ML0406200480), NRC authorized relief requests 1-CISI-1, 1-CISI-2, and 1-CISI-3 related to Containment Inservice Inspection Program for Unit 1. Therefore, Exceptions 1, 2, and 3 to the ASME Section XI Subsection IWE Program are applicable to Units 1, 2, and 3.

LRA Update

The following two items are not material changes to the CLB. Both items are administrative errors made at the time of the

issuance of the application. In both cases, the license renewal boundary diagrams were appropriately marked and the aging management reviews were appropriately performed, but the table line item was marked incorrectly:

REACTOR VESSEL VENTS AND DRAIN SYSTEM (010)

The (a) (2) block in Section 2.3.1.3 on page 2.3-9 was inadvertently marked "No." The corrected table is shown below:

(a) (1)	(a) (2)	(a) (3) FP	(a) (3) EQ	(a) (3) ATWS	(a) (3) SBO
Yes	Yes	No	No	No	No

The associated boundary drawings appropriately identified the components as being in-scope for 10 CFR 54.4(a) (2). There are no new component types, materials, or environments introduced into the system as a result of this change.

REACTOR CORE ISOLATION COOLING SYSTEM (071)

The (a) (2) block in Section 2.3.3.23 on page 2.3-84 was inadvertently marked "No." The corrected table is shown below:

(a) (1)	(a) (2)	(a) (3) FP	(a) (3) EQ	(a) (3) ATWS	(a) (3) SBO
Yes	Yes	Yes (F.3)	Yes (F.4)	Yes (F.7)	Yes

The associated boundary drawings appropriately identified the components as being in-scope for 10 CFR 54.4(a) (2). There are no new component types, materials, or environments introduced into the system as a result of this change.