

April 8, 2005

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

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNIT 1 - REQUEST FOR ADDITIONAL  
INFORMATION REGARDING REVISION TO EXCESS FLOW CHECK VALVE  
SURVEILLANCE TESTING FREQUENCY (TS-438) (TAC NO. MC4659)

Dear Mr. Singer:

By letter dated October 12, 2004, Tennessee Valley Authority (TVA) submitted a request for a Technical Specification change (TS-438) to revise the frequency of Surveillance Requirement 3.6.1.3.8 by testing a representative sample of excess flow check valves (EFCVs) every 24 months, so each EFCV is tested once every 120 months.

Based on our review of your submittal, the NRC staff finds that a response to the enclosed request for additional information is needed before we can complete the review.

This request was discussed with Mr. Tim Abney of your staff on March 31 and April 6, 2005, and it was agreed that a response would be provided within 30 days of the issuance of this letter.

If you have any questions, please contact me at (301) 415-4041.

Sincerely,

**/RA/**

Margaret H. Chernoff, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-259

Enclosure: Request for Additional Information

cc w/encl: See next page

## Request for Additional Information

### TS-438, Revision to Excess Flow Check Valve (EFCV) Surveillance Testing Frequency

- 1.0 Page E1-7 under Section B, "EFCV Failure rate" states that TVA will address crud build up and valve sticking by flushing lines and inspecting 100 percent of the EFCVs. The application does not address the time period between performance of the testing and startup of the plant. How will EFCV operability be maintained/assured during the time period between completion of the testing and startup of the plant?
- 2.0 For EFCV refueling testing it is not clear what action the licensee will take if an EFCV failure is identified within the "representative sample" or if a repeat EFCV failure is noted. For example, will another "representative sample" be tested?
- 3.0 The Radiological Dose Assessment of your submittal states that the leak flow rates and fluid pressure are taken from General Electric NEDO-21143-1, Radiological Accident Evaluation - The CONAC03 Code, dated December 1981. Please submit a copy of this report, or provide a reference to a prior submittal of this report.

Enclosure

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Mr. Karl W. Singer  
Tennessee Valley Authority

**BROWNS FERRY NUCLEAR PLANT**

cc:

Mr. Ashok S. Bhatnagar, Senior Vice President  
Nuclear Operations  
Tennessee Valley Authority  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Mr. Robert G. Jones  
Browns Ferry Unit 1 Plant Restart Manager  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35609

Mr. Larry S. Bryant, General Manager  
Nuclear Engineering  
Tennessee Valley Authority  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Mr. Scott M. Shaeffer  
Browns Ferry Unit 1 Project Engineer  
Division of Reactor Projects, Branch 6  
U.S. Nuclear Regulatory Commission  
61 Forsyth Street, SW.  
Suite 23T85  
Atlanta, GA 30303-8931

Mr. Michael D. Skaggs  
Site Vice President  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35609

Mr. Fredrick C. Mashburn  
Senior Program Manager  
Nuclear Licensing  
Tennessee Valley Authority  
4X Blue Ridge  
1101 Market Street  
Chattanooga, TN 37402-2801

General Counsel  
Tennessee Valley Authority  
ET 11A  
400 West Summit Hill Drive  
Knoxville, TN 37902

Mr. Timothy E. Abney, Manager  
Licensing and Industry Affairs  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35609

Mr. John C. Fornicola, Manager  
Nuclear Assurance and Licensing  
Tennessee Valley Authority  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
Browns Ferry Nuclear Plant  
10833 Shaw Road  
Athens, AL 35611-6970

Mr. Kurt L. Krueger, Plant Manager  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35609

State Health Officer  
Alabama Dept. of Public Health  
RSA Tower - Administration  
Suite 1552  
P.O. Box 303017  
Montgomery, AL 36130-3017

Mr. Jon R. Rupert, Vice President  
Browns Ferry Unit 1 Restart  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35609

Chairman  
Limestone County Commission  
310 West Washington Street  
Athens, AL 35611