



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001

November 29, 2005

MEMORANDUM TO: ACRS Members

FROM: Cayetano Santos Jr., Senior Staff Engineer **/RA/**
Technical Support Staff
ACRS/ACNW

SUBJECT: CERTIFICATION OF THE MINUTES OF THE PLANT LICENSE
RENEWAL SUBCOMMITTEE MEETING ON THE BROWNS FERRY
NUCLEAR PLANT UNITS 1, 2, AND 3 LICENSE RENEWAL
APPLICATION, OCTOBER 5, 2005 - ROCKVILLE, MARYLAND

The minutes of the subject meeting were certified on November 28, 2005, as the official record of the proceedings of that meeting. A copy of the certified minutes is attached.

Attachment: As stated

cc w/o Attachment:

J. Larkins
A. Thadani
M. Scott
M. Snodderly
S. Duraiswamy



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WASHINGTON, DC 20555 - 0001

MEMORANDUM TO: Cayetano Santos Jr., Senior Staff Engineer
Technical Support Staff, ACRS

FROM: Mario Bonaca, Chairman
ACRS Plant License Renewal Subcommittee

SUBJECT: CERTIFICATION OF THE MINUTES OF THE ACRS SUBCOMMITTEE
MEETING ON THE BROWNS FERRY NUCLEAR PLANT UNITS 1, 2,
AND 3 LICENSE RENEWAL APPLICATION, OCTOBER 5, 2005 -
ROCKVILLE, MARYLAND

I hereby certify, to the best of my knowledge and belief, that the minutes of the subject meeting on October 5, 2005, are an accurate record of the proceedings for that meeting.

Mario J. Bonaca

11/28/05

Mario Bonaca, Date
Plant License Renewal Subcommittee Chairman

CERTIFIED
11/28/05
by Mario Bonaca
Issued 10/24/05

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
MINUTES OF THE ACRS PLANT LICENSE RENEWAL SUBCOMMITTEE MEETING
ON THE BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3
OCTOBER 5, 2005
ROCKVILLE, MARYLAND

On October 5, 2005, the Plant License Renewal Subcommittee held a meeting in Room T2B3, 11545 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to review and discuss the license renewal application (LRA) for the Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3 and the associated Safety Evaluation Report (SER) with open items.

The meeting was open to the public. No written comments or requests to make oral statements were received from members of the public related to this meeting. Mr. Santos was the Designated Federal Official for this meeting. The meeting convened at 12:30 p.m. and adjourned at 4:20 p.m. on October 5, 2005.

ATTENDEES:

ACRS MEMBERS/STAFF

Mario Bonaca, Chairman
William Shack, Member
Graham Leitch, Consultant
Cayetano Santos Jr., ACRS Staff

Thomas Kress, Member
John Sieber, Member
John Barton, Consultant
John Lamb, ACRS Staff

NRC STAFF/PRESENTERS

Y. Sanabria, NRR
Y. Li, NRR
R. Auluck, NRR
M. Chernoff, NRR
D. Merzke, NRR
E. Brown, NRR
K. Tanabe, NRR
G. Cranston, NRR
C. Li, NRR
S. Hoffman, NRR
B. Rogers, NRR
K. Cozens, NRR
G. Cheruvenki, NRR
A. Lee, NRR
K. Chang, NRR
R. Pettis, NRR
J. Rowley, NRR
J. Raval, NRR
J. Tapp, NRR
M. Mitchell, NRR
P. Kuo, NRR

R. Subbaratnam, NRR
K. Parczewski, NRR
R. McNally, NRR
A. Hodgdon, OGC
S. Cahill, Region II
C. Julian, Region II
J. Zimmerman, NRR
M. Marshall, NRR
S. Mitra, NRR
A. Pal, NRR
H. Ashar, NRR
D. Jeng, NRR
L. Lois, NRR
J. Eads, NRR
J. Guo, NRR
N. Iqbal, NRR
M. Hartzman, NRR
H. Walker, NRR
B. Elliot, NRR
J. Yerokun, RES
T. Le, NRR

OTHER ATTENDEES

K. Groom, TVA
P. Crowley, Arizona Public Service
D. Burrell, TVA

K. Sutton, Morgan Lewis
B. Crouch, TVA
J. Valente, TVA

R. DeLong, TVA
H. Jones, TVA
R. Rucker, First Energy
K. Brune, TVA
M. Hamby, TVA
E. Blocher, Parsons
M. Heath, PGN
L. Beller, Progress Energy

R. Moll, TVA
J. McCarthy, TVA
S. Dort, First Energy
R. Jennings, TVA
D. Arp, TVA
R. Jansen, TVA
K. Green, ISL
M. Granthan, Progress Energy

The presentation slides, handouts used during the meeting, and a complete list of attendees are attached to the office copy of the meeting minutes.

Opening Remarks

Mario Bonaca, Chairman of the Subcommittee on Plant License Renewal, convened the meeting and made a few introductory remarks. The purpose of this meeting is to review the Tennessee Valley Authority (TVA) LRA for BFN, Units 1, 2, and 3 and the associated SER with open items. Chairman Bonaca summarized the major issues identified at the joint meeting of the Plant License Renewal and Plant Operations subcommittees on September 21, 2005.

Since BFN Unit 1 lacks the significant operating experience intended by the license renewal rule, compensatory actions have been implemented. These include applying operating experience from Units 2 and 3 and performing periodic inspections of Unit 1 components that were not replaced prior to restart. The Unit 1 Periodic Inspection Program is appropriate but more information is needed in order to determine its adequacy. The final SER should be revised to (1) discuss BFN Unit 1 operating experience, (2) describe the Unit 1 Periodic Inspection Program, and (3) clearly distinguish one-time inspections for license renewal from other inspections.

Staff Introduction

Mr. Kuo, NRR, introduced several members of the NRC staff including Mr. Subbaratnam (Project Manager), Ms. Diaz (Project Manager), Mr. Julian (Regional Inspector), and Mr. Cahill (Regional Inspector). The staff's review of this LRA is complicated by the concurrent licensing actions for extended power uprate (EPU), restart, and license renewal. Mr. Kuo emphasized that the staff's review of this LRA is based on the currently licensed power levels for each unit.

The staff will revise the SER to address the Unit 1 Periodic Inspection Program, the Unit 1 operating experience, and the terminology for one-time inspections.

Browns Ferry License Renewal Application

The presentation by Mr. Crouch, TVA, and Mr. DeLong, TVA, described the Browns Ferry plant, the Unit 1 Layup Program, Unit 1 operating experience, commitments for license renewal, and the open items.

All three BFN units are General Electric BWR4 reactors with Mark I containments. Units 2 and 3 were restarted in 1991 and 1995, respectively. Unit 1 is currently being recovered with restart planned for May 2007. The approximate durations of power operation are 10 years for Unit 1, 23 years for Unit 2, and 18 years for Unit 3. Mr. Crouch noted that all performance indicators for these units are green.

In a letter dated December 31, 2003, TVA submitted a single LRA for BFN Units, 1, 2, and 3. This LRA is based on the currently licensed thermal power levels for each unit (3298 MWt for Unit 1 and 3458 MWt for Units 2 and 3). Appendix F of the LRA describes the differences in the current licensing basis (CLB) between Unit 1 and Units 2 and 3. These differences will be

eliminated prior to restart of Unit 1. The current licenses expire on December 20, 2013, for Unit 1, June 28, 2014, for Unit 2, and July 2, 2016, for Unit 3.

Mr. DeLong, TVA, stated that 77 mechanical and electrical systems were included in the scope of license renewal. Scoping was based on reviews of the Updated Final Safety Analysis Report, safe shutdown analyses, licensing basis documents, maintenance rule documents, and the plant component database. The scoping methodology also considered events such as environmental qualification, fire protection, anticipated transients without scram, and station blackout.

The Time-Limited Aging Analyses (TLAAs) identified in the LRA include neutron embrittlement of the reactor vessel and internals, metal fatigue, environmental qualification of electrical equipment, primary containment fatigue, and other plant-specific analyses. The TLAAs associated with neutron embrittlement were based on 54 Effective Full Power Years (EFPY) for Unit 1 and 52 EFPY for Units 2 and 3. This resulted in peak reactor vessel fluences of 1.95×10^{18} n/cm² for Unit 1 and 2.3×10^{18} n/cm² for Units 2 and 3. These fluences also assumed EPU conditions.

Mr. DeLong listed the 39 aging management programs (AMPs) credited for license renewal at BFN. Eleven of these AMPs are existing programs that require no enhancement and 11 are existing programs whose only revision is to include Unit 1. Six of these AMPs are new programs. The One-Time Inspection Program is one of the new AMPs. This program confirms that aging effects are not occurring or that aging effects are occurring at a rate that does not affect the intended function of the component. These inspections will be completed prior to entering the period of extended operation. Some of the components that will be inspected under this program include the reactor coolant pressure boundary, the bottoms of above ground tanks, submerged concrete and component supports, and ventilation ducts.

Thirty-eight of the 39 AMPs are common to all three units. The Unit 1 Periodic Inspection Program applies only to Unit 1. Mr. Crouch stated that this program will inspect a subset of nonreplaced piping locations in Unit 1 to verify that no additional aging effects are occurring. Credit will be taken for restart inspections of these components. The first round of inspections will be completed after several years of Unit 1 operation but prior to entering the period of extended operation. Additional inspections will be performed during the period of extended operation. The frequency of subsequent inspections will be determined based on inspection results.

Unit 1 Layup

Mr. Crouch stated that the Unit 1 Layup Program is consistent with the criteria in EPRI NP-5106, "Sourcebook for Plant Layup and Equipment Preservation," Revisions 0 and 1. In addition, lessons learned from the layup and restart of Unit 3 are being applied to Unit 1. Both wet and dry layup conditions are used in Unit 1 systems. Visual, surface, ultrasonic, and remote inspections were performed to assess the condition of Unit 1 components and results have met or exceeded the EPRI guidelines. Mr. Crouch emphasized that TVA has not taken credit for this layup program **as the sole basis** for determining the acceptability of components for restart.

Chairman Bonaca noted that the SER documents several problems with the Unit 1 Layup Program. Mr. Crouch responded that these problems occurred during the initial implementation of the layup program and have been corrected.

Unit 1 Operating Experience

BFN Unit 1 meets the requirement of 10 CFR 54.17(c) that "an application for a renewed license may not be submitted to the Commission earlier than 20 years before the expiration of the operating license currently in effect." The operating experience from BFN Units 2 and 3 are

applicable to Unit 1. Both internal and external plant operating experience has been incorporated into the BFN Corrective Action Program.

BFN Unit 3 was shut down for ten years before it was restarted in 1995. During the last ten years of operation, no layup-induced aging effects have been observed. Experience with the layup of Unit 3 has been incorporated into the recovery of Unit 1. The licensing basis, design, configuration, operating procedures, technical specifications, and updated Final Safety Analysis Report for all three units will be identical when Unit 1 restarts.

License Renewal Commitments

To date TVA has made approximately 114 license renewal commitments through the LRA and responses to requests for additional information. These commitments are tracked using two separate systems: the onsite computerized commitment tracking system (TROI) and the Corrective Action Program.

Open Items

Mr. Crouch concluded his presentation by listing three of the license renewal open items. The staff noted that there are now four open items because the issue of the Unit 1 Periodic Inspection Program was elevated from a confirmatory item to an open item.

Safety Evaluation Report Overview

The presentation by Mr. Subbaratnam, NRR, and Ms. Diaz, NRR, described the staff's evaluation of scoping and screening activities, aging management activities, and TLAAs.

The SER with open items related to BFN Units 1, 2, and 3 was issued on August 9, 2005. It contained two open items, three confirmatory items, and four proposed license conditions. Since the SER was issued one additional open item was added and one of the confirmatory items was elevated to an open item.

Scoping and Screening Results

TVA revised its methodology for scoping of supports and equivalent anchors for cases in which nonsafety-related components are directly connected to safety-related components. As a result, new portions of piping components and two additional structures were brought into the scope of license renewal.

Based on the staff's review of the containment penetration seals and the associated piping and supports outside of the secondary containment, TVA made changes to the mechanical system boundary drawings.

One of the open items deals with scoping of the refueling cavity seal. Leakage from this seal could lead to corrosion of the inaccessible portion of the drywell shell. The staff proposed that TVA either bring the refueling cavity seal into the scope of license renewal or periodically monitor the inaccessible portion of the drywell shell for degradation.

Scoping and screening of electrical and I&C systems were performed using the spaces approach. The staff questioned the exclusion of the source range monitor and intermediate range monitor circuit cables from the scope of license. TVA agreed to bring the intermediate range monitor circuits into scope and manage them with a suitable AMP.

Section 2.6 of the SER describes the integration of the restart and license renewal activities for BFN Unit 1. Appendix F of the LRA describes 13 differences in the CLB of Unit 1 and Units 2 and 3. One of the proposed license condition is that these differences be eliminated.

The staff concluded that pending the satisfactory resolution of open items, the applicant has adequately identified those systems and components within the scope of license renewal and subject to an aging management review.

Aging Management Program Review and Audits

Mr. Subbaratnam described the staff's evaluation of some of the AMPs and aging management reviews for BFN.

The Overhead Heavy Load and Light Load Handling Systems Program takes exception to a recommendation in the Generic Aging Lessons Learned (GALL) Report that crane fatigue be monitored. TVA evaluated fatigue of the reactor building crane as a TLAA so fatigue monitoring was not required. The staff found this acceptable.

The Buried Piping and Tanks Inspection Program relies solely on opportunistic inspections. TVA has committed to inspect buried piping within ten years of entering the period of extended operation unless an opportunistic inspection has occurred. If a conclusive opportunistic inspection has not occurred within this ten-year period, TVA will perform a focused inspection of buried piping.

During the review of the Aboveground Carbon Steel Tanks Program, the staff noted that this AMP does not measure the bottom thicknesses of fuel oil tanks. TVA revised the One-Time Inspection Program to require ultrasonic thickness measurements of these components.

One of the confirmatory items deals with loss of preload and cracking of bolting. The staff requested the results of any self assessments, inspections, and maintenance activities on auxiliary system bolting. Region II will document their review of this information in an inspection report to be issued in November 2005.

The aging management review of inaccessible areas of civil structures and components examined test samples taken from groundwater and the Wheeler Reservoir. Based on the pH, chloride level, and sulfate level, the environment is non-aggressive.

Section 3.7 of the SER describes the aging management review of Unit 1 systems in layup. In order to address the staff's concern about new degradation mechanisms from the extended outage, TVA committed to perform periodic inspections of Unit 1 components through the period of extended operation. The staff is currently reviewing the elements of the Unit 1 Periodic Inspection Program submitted by TVA. The final SER will document the staff's review of this program. The staff has elevated this issue from a confirmatory item to an open item.

The staff concluded that pending satisfactory resolution of open items, the applicant has demonstrated that aging effects will be adequately managed so that the intended functions of systems and components will be maintained consistent with the CLB for the period of extended operation.

Time-Limited Aging Analyses

Ms. Diaz, NRR, described the staff's evaluation of TLAAAs associated with neutron embrittlement, metal fatigue, and stress relaxation of core plate hold-down bolts.

Neutron embrittlement effects the reactor vessel and internals. The minimum upper shelf (USE) energy requirements for vessel materials are described in 10 CFR 50 Appendix G. TVA assumed that USE values did not meet these requirements so they performed a generic analysis that demonstrates margins equivalent to those in 10 CFR 50 Appendix G through the end of the period of extended operation. In an independent analysis, the staff confirmed this conclusion. Ms. Diaz also provided a table of the adjusted reference temperatures for the limiting beltline materials in each unit.

The Fatigue Monitoring Program will manage the effects of aging on components with cumulative usage factors that are projected to exceed the ASME Section III Class 1 limit before the end of the period of extended operation.

One of the open items deals with stress relaxation of core plate hold-down bolts. A TLAA was performed assuming a 20% loss of preload. TVA's plant-specific analysis stated that these bolts will maintain sufficient preload to prevent sliding of the core plate and meet ASME Section III Class 1 Level D service limits at the end of the period of extended operation. The staff reviewed the generic stress relaxation analysis and requested additional information regarding horizontal and vertical loads for all operating conditions, sliding of the core plate, and bolt stresses.

In section 4.8 of the SER, the staff concluded that pending satisfactory resolution of open items, the applicant has provided adequate analyses of TLAAs.

Onsite Inspection Results

License Renewal

Mr. Julian, Region II, described the inspections performed by the Region to support the NRR's review of the LRA. A site-specific inspection plan is developed for each applicant, but the same team of inspectors are used for consistency. These inspections were performed according to Manual Chapter (MC) 2516 and Inspection Procedure (IP) 71002. MC 2516 and IP 71002 have been revised to reduce the scope of the scoping and screening inspections and combine them with the AMP inspections. The objective of the scoping and screening inspection is to confirm that the applicant has included all appropriate structures, systems, and components in the scope of license renewal. The focus of this inspection is on scoping of nonsafety-related equipment that could impact safety-related equipment.

The objective of the AMP inspection is to confirm that existing AMPs are working well and to examine the applicant's plans for establishing and enhancing other AMPs. During this inspection, inspectors examine records of past tests and surveillances, verify the inclusion of future tasks into established tracking systems, and verify that the material condition of the plant is being adequately maintained.

An additional (optional) inspection can be performed to close out open items from previous inspections or issues requested by NRR. This inspection also verifies that a transition plan for the completion of the license renewal project has been established.

The AMP inspection for BFN was conducted from November 29, to December 17, 2004. Inspectors found that existing programs are generally functioning well, but the applicant had not begun the implementation process for new and enhanced AMPs. In walkdowns of plant systems, inspectors examined plant equipment and found no significant adverse conditions. It appeared that plant equipment was being adequately maintained.

A second AMP inspection was conducted from September 19 to 23, 2005 to review a sample of AMP implementation packages. Inspectors found that the packages contained some errors and were not meticulously reviewed. In response to these findings, TVA initiated a Problem Evaluation Report (PER) for corrective action. Inspectors also reviewed TVA's plans for tracking future actions and found that the implementation packages were not linked to the computerized commitment tracking system. The commitments were in the tracking system but they were difficult to find. TVA committed to track future actions using their PER process. Region II plans to conduct a future inspection to followup on these issues.

Mr. Julian concluded his presentation by stating that all of the performance indicators for BFN Units 2 and 3 are green.

Unit 1 Inspections

Mr. Cahill, Region II, described the Regions oversight activities regarding the restart of Unit 1. In August 2003 the NRC established MC 2509 specifically for the oversight of BFN Unit 1. A unique NRC manual chapter was needed because (1) the Reactor Oversight Process (ROP) was implemented after the recoveries of Units 2 and 3, (2) TVA was using their normal design change process for the recovery, and (3) the focus of inspections should be on program implementation and not on program adequacy. In developing MC 2509 a conscious decision was made not to test new construction approaches.

The regulatory framework for the restart of Unit 1 was issued by the NRC on August 14, 2003. The Unit 1 inspection plan is unlike that used for new construction in that it is based on the regulatory framework document and the Recovery Issues List. This list was first issued publicly in July 2005 and is updated quarterly by TVA. Inspections are performed when programs are completed and substantial physical work has been done. The focus of inspections are to review applicable inspection procedures for reference, review issue background and references, identify any differences from the resolution of Units 2 and 3, and sample TVA's implementation.

The NRC has also established a matrix to transition Unit 1 into the ROP. As of January 1, 2005, four of the ROP cornerstones are being used for Unit 1.

In the final phases of recovery, the focus of inspections will be on system adequacy testing. This will be done by a risk-informed sampling to ensure systems can perform their intended safety function.

Mr. Cahill concluded his presentation by describing the staff's current inspection plans for BFN Unit 1. The charter of the Restart Oversight Panel has been prepared and is ready for signature. The staff is planning for inspections of system recoveries and reviewing the restart test program. Finally, license renewal and EPU open items will be incorporated into the Region's inspections as appropriate.

Subcommittee Discussion

Several Members commented that the final SER should discuss the operating experience issue for Unit 1. This should include a better justification of the applicability of operating experience from Units 2 and 3 to Unit 1.

Consultant Leitch stated that the configuration of Unit 1 being approved for license renewal should be clarified because the unit has undergone many changes since the LRA was originally submitted. Consultant Leitch also noted that the issue of AMP ownership is important and the staff should review TVA's plan for transferring these license renewal programs to the permanent plant staff.

Member Kress commented that TVA has identified the correct AMPs and followed the guidance in the GALL Report. Member Kress added that the Region's presentations were useful.

Member Sieber stated that the Region's restart inspections are appropriate.

Member Shack stated that TVA has restart experience from Unit 3 and has a good case for the applicability of operating experience from Units 2 and 3 to Unit 1. Member Shack expressed concern about the slow development of the procedures for the AMPs.

Consultant Barton stated that transient testing is important in order to verify that all of the new equipment will behave as expected.

Chairman Bonaca stated that if the Unit 1 Periodic Inspection Program is appropriate, there does not appear to be anything that would preclude the issuance of a renewed license.

The Members also provided guidance to TVA and the staff regarding their presentations to the Full Committee on October 6, 2005.

Member Comments and Questions

General

Since the configuration of BFN Unit 1 has changed since the LRA was submitted in 2003, Consultant Leitch asked what configuration is the basis of the staff's review. The staff responded that their review is based on the configuration of Unit 1 at restart. TVA added that as part of the Unit 1 recovery effort, no new materials have been introduced that were not already in use at Units 2 and 3.

In response to a question from Member Shack the staff stated that Appendix F of the LRA lists the necessary **and sufficient** changes that need to be made in order to make the CLB of Unit 1 identical to that of Units 2 and 3. Consultant Leitch requested that the licensing basis updates be provided to the Committee.

In response to a question from Consultant Leitch, TVA stated that Unit 1 is partially under the ROP process and partially under traditional enforcement. There are no inspection findings greater than green for BFN.

TVA states that Unit 1 will be restarted at the uprated power level and the CLB for all three units will be identical. Consultant Leitch asked if this implies that the EPU modifications have no impact on the CLB. TVA stated that the EPU modifications don't impact the CLB as far as license renewal is concerned. If the LRA was submitted at EPU conditions and approved, it would be an implicit approval of an EPU.

Chairman Bonaca stated that the intent of the license renewal rule is that significant plant-specific operating experience be available to support LRAs. In order to compensate for the lack of operating experience for Unit 1, TVA has applied operating experience from Units 2 and 3 to Unit 1 and committed to perform periodic inspections. Member Shack added that operating experience from all BWRs are applicable to BFN Unit 1 and the periodic inspections address a concern that a degradation mechanism could exist in BFN Unit 1 that is not present in any other unit. TVA stated that no new materials have been introduced into Unit 1 that were not already used in the other units and they are working with the staff to document these issues in the final SER.

Consultant Leitch asked TVA about ownership of the AMPs. TVA stated that the AMPs are owned by the operating staff and not a separate license renewal organization. The staff added that part of the followup inspection will be to review TVA's program to transfer ownership of AMPs.

Consultant Barton asked about the maintenance rule requirements for Unit 1. TVA stated that all of the preventive maintenance, inspections, and calibrations will be entered into their Maintenance Rule Program so the maintenance rule can be implemented prior to restart.

Consultant Leitch asked about the emergency equipment cooling water drains that were plugged with debris. The emergency equipment cooling water passes through these catch basins on its way out of the plant. The staff found these basins partially plugged but concluded that the basins could still serve their intended function. TVA took corrective actions to address this problem.

Chairman Bonaca and Consultant Leitch asked about the fuel for Unit 1. TVA stated that the core will consist of new GE fuel with some once and twice burned fuel from Unit 2.

In response to a question from Member Shack, TVA stated that Unit 3 was restarted such that it was identical to Unit 2.

Aging Management

Consultants Leitch and Barton asked why there is no AMP for fuse holders. TVA stated that they examined 14,000 fuses and determined that there were no aging effects that required management. In addition, the procedures and maintenance activities at BFN do not require the removal and reinstallation of many fuses. A review of their operating experience over the last five years showed that only three fuses had been pulled. The staff accepted TVA's justification that an AMP for fuse holders is not needed.

Consultant Leitch asked about the status of the AMPs that have not been fully developed. TVA stated procedures have been developed and are currently being reviewed.

Chairman Bonaca noted that inspection results may identify additional work that would have to be put into AMP procedures and asked how differences among the units would be addressed. TVA responded that differences would be addressed in the implementing guidelines. For example, the conditions of the vessel internals are different for each unit, but the BWR inspection and repair guidelines determine what will be done for each condition.

Consultant Barton asked why so many components were covered by the One-Time Inspection Program. TVA responded that the LRA and SER are confusing because three different kinds of inspections are referred to as one-time inspections. These include restart inspections for Unit 1 recovery, baseline inspections for the Unit 1 Periodic Inspection Program, and one-time inspections for license renewal.

In response to a question from Chairman Bonaca, TVA stated that a description of the Unit 1 Periodic Inspection Program has already been submitted to the staff for their review. Chairman Bonaca stated that as much detail as possible should be provided to the staff for documentation in the final SER. Consultant Leitch added that this program should also consider issues that are related more to age than to wear. Chairman Bonaca agreed that it is appropriate for this program to perform at least three inspections.

Chairman Bonaca noted that the SER documents several problems with the Unit 1 Layup Program. TVA stated that these problems occurred during the initial implementation of the layup program and have been corrected.

Chairman Bonaca agreed with TVA's statement that the Unit 1 Layup Program was not relied upon **as the sole basis** for justifying the acceptability of a component for restart.

Consultant Barton asked about the layup conditions of the secondary side of the main condensers. TVA responded that this condenser was open to atmosphere. The condenser tubes were replaced with stainless steel and will be inspected prior to restart.

Consultant Barton asked about the open item related to inspection of the residual heat removal service water piping. The staff requested that TVA inspect these pipes. Since these pipes are embedded, this inspection would have to be done visually from the inside of the pipe. TVA does not agree that a visual inspection is needed because corrosion inhibitors and biocides are injected immediately upstream to these pipes.

Consultant Barton asked why the staff accepted an 18-month inspection interval for carbon dioxide fire protection systems when the GALL Report recommends an 12-month inspection

interval. The staff responded that the 18-month interval is acceptable because it is in the plant's CLB.

In response to a question from Consultant Barton, TVA stated that no cracks have been found in the upper core plates.

Consultant Leitch asked what is done to protect the upper core plate from intergranular stress corrosion cracking. TVA stated that noble metals with hydrogen water chemistry is used to protect the core plate and all the core internals.

Consultant Leitch stated that the Committee is concerned about the high work load involved with commitments to implement AMPs prior to entering the period of extended operation. TVA stated that the schedule for implementing the AMPs is still being developed but a draft schedule would be provided to the Committee during their review of the final SER in March 2006.

TLAAs

The fluences used for the neutron embrittlement TLAAs are based on 54 EFPY for Unit 1 and 52 EFPY for Units 2 and 3. Consultant Leitch noted that these values demonstrate significant margin. TVA stated that different assumptions led to the different EFPYs. For Unit 1 a capacity factor of 85% was assumed for the first 40 years of operation. For Units 2 and 3 a capacity factor of 80% was assumed for the first 40 years of operation.

Member Shack asked why TVA assumed that the irradiated USE values were below the 50 ft-lb requirement. The staff stated that the unirradiated USE values for these materials are not available so TVA was unable to calculate the irradiated value.

Consultant Leitch asked about the TLAA associated with dose to seal rings. The staff stated that the seal rings are for valves in the high pressure coolant injection system and the reactor core isolation system. TVA added that this is no longer a TLAA because tests are performed on these components to check for unacceptable degradation.

Inspections

Chairman Bonaca asked about overlap in the Region's inspections for restart and license renewal. The staff stated that different inspectors were used for the restart and license renewal inspections at BFN.

Chairman Bonaca asked about the timing of the Region's followup inspections for license renewal. The staff responded that the inspections are done to support NRR's schedule but the time of the followup inspection hasn't been determined.

Member Sieber asked how the Unit 1 recovery efforts differ from constructing a new plant. From the Region's perspective the scope of inspections is much smaller for recovery than for new construction. The modifications associated with the restart apply to just a small subset of a system and not the entire system so there is less to verify. In addition, TVA used their normal design change process which is familiar to inspectors. For new construction inspectors would be looking at things for the first time.

In response to a question from Consultant Leitch, the staff stated that no large transient tests are planned for Unit 1.

Subcommittee Decisions and Follow-up Actions

The Subcommittee Chairman will summarize the discussions to the full Committee during the October 2005 ACRS meeting and recommend whether an interim letter be issued.

Background Materials Provided to the Committee

1. Tennessee Valley Authority, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Application for Renewed Operating Licenses," December 31, 2003
2. Tennessee Valley Authority, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - January 28, 2004 Meeting Follow-Up - Additional Information," February 19, 2004
3. U.S. Nuclear Regulatory Commission, "Safety Evaluation Report with Open Items Related to the License Renewal of the Browns Ferry Nuclear Plant, Units 1, 2, and 3," August 2005
4. Brookhaven National Laboratory, "Audit and Review Report for Plant Aging Management Programs (AMPs) and Aging Management Reviews (AMRs), Browns Ferry Nuclear Plant Units 1, 2, and 3," April 26, 2005
5. U.S. Nuclear Regulatory Commission, "Browns Ferry Nuclear Plant - Inspection Report 05000259/2004012, 05000260/2004012, and 05000296/2004012," January 27, 2005
6. U.S. Nuclear Regulatory Commission, "10 CFR Parts 2, 50, 54, and 140, Nuclear Power Plant License Renewal," *Federal Register*, Vol. 54, No. 240, December 13, 1991, pp. 64943-64980
7. U.S. Nuclear Regulatory Commission, "10 CFR Parts 2, 51, and 54, Nuclear Power Plant License Renewal; Revisions," *Federal Register*, Vol. 60, No. 88, May 8, 1995, pp. 22461-22495

NOTE:

Additional details of this meeting can be obtained from a transcript of this meeting available in the NRC Public Document Room, One White Flint North, 11555 Rockville Pike, Rockville, MD, (301) 415-7000, downloading or view on the Internet at <http://www.nrc.gov/reading-rm/doc-collections/acrs/> can be purchased from Neal R. Gross and Co., 1323 Rhode Island Avenue, NW, Washington, D.C. 20005, (202) 234-4433 (voice), (202) 387-7330 (fax), nrgross@nealgross.com (e-mail).
