August 6, 2006

Mr. Karl W. 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 FOR RESPONSE TO GENERIC LETTER 98-04, POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT (TAC NO. MC3159)

Dear Mr. Singer:

By letter dated May 11, 2004, the Tennessee Valley Authority submitted to the U.S. Nuclear Regulatory Commission (NRC) a response to Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System after a Loss of Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," for Browns Ferry Nuclear Plant, Unit 1.

A response to the enclosed Request for Additional Information (RAI) is needed before the NRC staff can complete the review. This RAI was discussed with Mr. Bill Crouch and others of your staff on August 4, 2006, and it was agreed that a response would be provided within 30 days of receipt of this letter. If you have any questions, please contact me at (301) 415-4041.

Sincerely,

/**RA**/

Margaret H. Chernoff, Project Manager Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket No. 50-259

Enclosure: Request for Additional Information

cc w/enclosure: See next page

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

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Dear Mr. Singer:

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cc w/enclosure: See next page <u>DISTRIBUTION</u>: See next page

NRR-106

OFFICE	LPL2-2/PM	LPL2-2/LA	CSGB/BC	LPL2-2/BC
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DATE	8/4/06	8/7/06	8/2/06	8/6/06

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SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNIT 1 — REQUEST FOR ADDITIONAL INFORMATION FOR RESPONSE TO GENERIC LETTER 98-04, POTENTIAL FOR DEGRADATION OF THE EMERGENCY CORE COOLING SYSTEM AND THE CONTAINMENT SPRAY SYSTEM AFTER A LOSS-OF-COOLANT ACCIDENT BECAUSE OF CONSTRUCTION AND PROTECTIVE COATING DEFICIENCIES AND FOREIGN MATERIAL IN CONTAINMENT (TAC NO. MC3159)

Dated: August 6, 2006

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REQUEST FOR ADDITIONAL INFORMATION

RESPONSE TO GENERIC LETTER 98-04

TENNESSEE VALLEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT, UNIT 1

DOCKET NO. 50-259

- 1. Please discuss the scope of the coating inspection performed at the Browns Ferry Nuclear plant (BFN), Unit 1, in response to Generic Letter 98-04. Please discuss the criteria used to determine the inspection scope and how you have accounted for the period of extended shutdown. Please provide the inspection results in sufficient details to enable the NRC staff to make its safety findings. Some of the details should include the types of coating degradation identified, sizes, causes, repairs, etc.
- 2. Your response stated that when localized areas of degraded coatings are identified, they are evaluated and subsequently repaired as necessary. Please discuss (1) the criteria used to determine what constitutes "localized areas of degraded coatings" and the corrective actions that are followed, (2) what corrective actions are taken if the "localized" criteria is exceeded, (3) identify what major (exceed localized limits) coating work has been or needs to be performed, (4) identify the reason (cause of failure), extent and coating system chosen for any major coating work and (5) discuss the criteria when repair or replacement would not be necessary, how repairs are scheduled and include prioritization of repair work.
- 3. Please discuss how containment coatings are evaluated for acceptability when degraded areas are identified (this is not intended to be a discussion regarding qualification) and how the extent of coating degradation in these areas is determined.
- 4. Your response stated that the coating inspection included the exposed components and surfaces inside the primary containment. Please discuss the coating inspection, including scope, periodicity, method of inspection, etc., associated with components that are not exposed, i.e., submerged portions of the torus.
- 5. Your response stated that you had a certain limit on the amount of unqualified coating. Please discuss how degraded or unqualified coatings are assessed for impact on the emergency sump. Please include in the discussion how degraded or unqualified coatings in unexposed areas are addressed when assessing impact on the sump.
- 6. Please provide a description of any physical testing (e.g. adhesion) performed at BFN1. Include the results of any such testing.

BROWNS FERRY NUCLEAR PLANT

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

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Mr. Masoud Bajestani, Vice President Browns Ferry Unit 1 Restart Browns Ferry Nuclear Plant Tennessee Valley Authority P.O. Box 2000 Decatur, AL 35609 Mr. Robert G. Jones, General Manager Browns Ferry Site Operations Browns Ferry Nuclear Plant Tennessee Valley Authority P.O. Box 2000 Decatur, AL 35609

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