



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW, SUITE 23T85
ATLANTA, GEORGIA 30303-8931

April 27, 2007

Tennessee Valley Authority
ATTN: Mr. Preston D. Swafford,
Interim Chief Nuclear Officer and
Executive Vice President
6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT UNIT 1 RECOVERY - NRC LICENSE
RENEWAL INSPECTION REPORT 05000259/2007011 - NRC TEMPORARY
INSTRUCTION 2509/001

Dear Mr. Swafford:

On April 13, 2007, the U.S. Nuclear Regulatory Commission (NRC) completed a license renewal inspection associated with recovery activities at your Browns Ferry Unit 1 reactor facility. The enclosed inspection report documents the inspection results, which were discussed on April 13, 2007, with Mr. Brian O'Grady and other members of your staff.

This inspection examined activities conducted under your Unit 1 license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license and the actions you have taken to fulfill license renewal commitments. Specifically this inspection was conducted in accordance with NRC Temporary Instruction 2509/001 to verify your completion of the commitments in Appendix F of your license renewal application as required by Condition 2.H of your renewed license. These were the modifications you committed to make to bring the Unit 1 current licensing basis (CLB) consistent with the CLB of Units 2 and 3 prior to Unit 1 restart. Inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. The inspection concluded that you have completed those commitments.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Mark S. Lesser, Chief
Construction Inspection Branch 1
Division of Construction Inspection

Docket No. 50-259
License No. DPR-33

Enclosure: Inspection Report 05000259/2007011
w/Attachment: Supplemental Information

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cc w/encl cont: (See next page)

TVA

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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No: 50-259

License No: DPR-33

Report No: 05000259/2007011

Licensee: Tennessee Valley Authority (TVA)

Facility: Browns Ferry Nuclear Plant, Unit 1

Location: Corner of Shaw and Nuclear Plant Roads
Athens, AL 35611

Dates: April 9 - 13, 2007

Inspectors: C. Julian, Senior Project Manager
L. Mellen, Senior Project Engineer

Approved by: Mark S. Lesser, Chief
Construction Inspection Branch 1
Division of Construction Inspection

Enclosure

EXECUTIVE SUMMARY

Browns Ferry Nuclear Plant, Unit 1
NRC Inspection Report 05000259/2007011

IR 05000259/2005-011; 4/09-13/2007; Browns Ferry Nuclear Plant Unit 1; License Renewal Inspection Program, TI 2509/001

This inspection of License Renewal (LR) activities was performed by two regional office engineering inspectors. This inspection did not identify any "findings" as defined in NRC Manual Chapter 0612.

This license renewal inspection was conducted in accordance with NRC Temporary Instruction 2509/001 to verify TVA completion of the commitments in Appendix F of the Browns Ferry license renewal application as required by Condition 2.H of the renewed license. These were the modifications TVA committed to make to bring the Unit 1 current licensing basis (CLB) consistent with the CLB of Units 2 and 3 prior to Unit 1 restart.

The inspection program for the Unit 1 Restart Program is described in NRC Inspection Manual Chapter 2509. Information regarding the Browns Ferry Unit 1 Recovery and NRC Inspections can be found at <http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/bf1-recovery.html>.

Inspection Results

The inspection concluded that TVA has completed those commitments. The inspectors identified several examples of inappropriate documentation practices in paper copies of modification packages in the document control center. The licensee entered this issue into their corrective action system as Problem Evaluation Report number 123276 for resolution (see paragraph II.B).

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REPORT DETAILS

I. Inspection Scope

In 1985, TVA shut down all three units at BFN to address management and technical issues. Upon successful resolution of these issues, Unit 2 was restarted in 1991. Unit 3 was restarted in 1995. TVA has stated that it will not restart Unit 1 without prior approval from the NRC. With the exception of Unit 1 systems and components that are required to be in-service to support the current fueled status of Unit 1 or to support the operation of Units 2 and 3, Unit 1 has remained shutdown since 1985 with key systems and components placed in layup. TVA has initiated a restart plan to return Unit 1 to service. TVA has stated that the basic TVA principle for the Unit 1 Restart is that all three BFN units will be operationally identical upon completion of Unit 1 restart activities. To meet this principle, TVA plans for the Unit 1 current licensing basis (CLB) at restart to be the same as the CLB of Units 2 and 3. The license renewal Application (LRA) states that the Unit 1 restart program will result in three operationally identical BFN units, providing assurance that the Unit 1 CLB changes implemented prior to restart will result in the same Aging Management Programs for each unit.

This license renewal inspection was conducted in accordance with NRC Temporary Instruction 2509/001 to verify TVA completion of the commitments in Appendix F of the Browns Ferry LRA as required by Condition 2.H of the renewed license. These were the modifications TVA committed to make to bring the Unit 1 CLB consistent with the CLB of Units 2 and 3 prior to Unit 1 restart.

II. Findings and Observations

A. Status of LRA Appendix F Prior to Restart Item Followup

F.1 - Evaluate and Modify, as Required, Main Steam Leakage Path Piping to Ensure Structural Integrity

TVA commitment item Nuclear Central Office (NCO) 020065001 was written to complete Seismic Ruggedness Analysis and modifications prior to Unit 1 restart. This NCO was implemented with Design Change Notice (DCN) 51112 which modified supports of the main steam leakage path piping which directs any main steam isolation valve (MSIV) leakage to the main condenser. The systems modified included Main Steam, High Pressure Coolant Injection, Turbine Vents and Drains, and the Auxiliary Boiler. Modifications to the Main Control Room Panel were covered under DCN 51097. The inspectors reviewed the design change package, post modification test results, and visually verified field installation. The inspectors confirmed that this modification is complete and implemented the BWR Owners Group (BWROG) methodology described in NEDC-31858P-A "BWROG Report for Increasing MSIV Leakage Rate Limits and Elimination of Leakage Control Systems."

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F.2 - Implement Containment Atmospheric Dilution System Modifications

TVA commitment item NCO 860184001 was written to install an alternate supply of nitrogen from the existing Containment Atmospheric Dilution (CAD) system to the drywell control air system. This NCO was implemented with DCN 51201 which provided the physical modifications to the CAD system as a backup alternate source to the drywell control air valves and the torus vacuum breakers. The inspectors reviewed the design change package, post modification test results and visually verified the field installation. The inspectors also reviewed the system pre-operability check lists (SPOCs) for system 32, Control Air and system 76, Containment Inerting, which interfaced with system 84, CAD System. The inspectors did not note any significant SPOC discrepancies. The implementation of these changes was previously verified in NRC inspection report 50-259/2006006. The inspectors confirmed that these modifications completed this commitment which was associated with NUREG 0737 Item II.K.3.28.

F.3 - Revise Fire Protection Program Report per Unit 1 License Condition 2.C.13

The inspectors reviewed the initial issue of the 3-Unit Fire Protection Report. This report replaced in its entirety the Unit 2/3 Fire Protection Report, Volume 1, for dual unit operation. The inspectors confirmed that the report had been developed in accordance with the guidelines of NRC Generic Letter 86-10, "Implementation of Fire Protection Requirements" and NRC Generic Letter 88-12, "Removal of Fire Protection Requirements from Technical Specifications". The inspectors reviewed the 3-Unit Fire Protection Report document and performed walkdowns of selected sections. Additionally, the inspectors reviewed operator training for the 3-Unit fire protection procedures. The NRC has performed extensive inspections of the 3-Unit fire protection program that are documented in NRC inspection reports 50-259/2007009, 50-259/2006009, 50-259/2006012, 50-259/2005016, and 50-259/2004009. The inspectors concluded that TVA has developed a 3-Unit fire protection program that is ready for implementation in accordance with License Condition 2.C.3.

F.4 - Implement Environmental Qualification (EQ) Program

The NRC has inspected the implementation of the EQ program for Unit 1 several times previously and the issue was closed in inspection report 50-259/2006-009. At the time of previous closure there were four remaining EQ items for TVA to complete. This inspection looked at these four additional items. The remaining items were the Residual Heat Removal (RHR) pump motors 1-MTR-074-0005, 0016, 0028, and 0039. The inspectors reviewed document W84-061109-014 dated 11/9/2006, "10CFR 50.49 Baseline Data for System 74". The document reviewed the previous maintenance history records for those four motors and concluded that previous maintenance had done nothing to alter the original EQ capability of those motors therefore they were suitable for future use. The inspectors found the EQ documentation satisfactory.

F.5 - Address GL 88-01, and Make Necessary Modifications

This item deals with the replacement of stainless steel piping in various locations to prevent intergranular stress corrosion cracking (IGSCC). This item has been inspected several times in previous NRC inspection reports 50-259/2005-008, 50-259/2006-006, and 50-259/2006-07 and has been closed previously. During the current inspection the inspectors reviewed pertinent portions of the following modification packages.

DCN 51045 System 68 Reactor Recirculation
 DCN 51194 Reactor Water Cleanup System (RWCU)69
 DCN 51193 IGSCC Inside RPV and Outside Drywell
 DCN 51046 RWCU Inside Drywell
 DCN 51151 RHR Inside Drywell System 74
 DCN 51152 Core Spray Inside Drywell System 75

Based on review of this documentation the inspectors concluded that these modifications are implemented.

F.6 - BWRVIP Programs Used for Units 2 and 3 will be used for Unit 1

This item has been previously documented in NRC inspection report 50-259/2006-006. During this inspection the inspectors reviewed the document 0-TI-365, Reactor Pressure Vessel Internals Inspection (RPVII), Rev. 23, dated 2/5/2007. Appendix 9.1 of that document contains the RPVII requirements for Unit 1 which implement the BWRVIP program requirements. The inspectors also reviewed portions of a General Electric report IN Vessel Visual Inspection (IVVI) Phase 1 Final Report, Fall Cycle 6 Restart Outage. That document contained the results of the RPVII performed by GE for TVA prior to the Unit 1 restart. The results of Unit 1 inspection were thorough and comprehensive. The inspectors concluded that the BWRVIP program is implemented for Unit 1.

F.7 - Install Anticipated Transient Without Scram (ATWS) Features

This item has been previously inspected and closed in NRC inspection report 50-259/2006-007. During the current inspection the inspectors reviewed pertinent portions of DCNs 51240, 51234, and 51243. These modification packages in various stages installed the DC powered Alternate Rod Insertion features, modified Standby Liquid Control system to use sodium pentaborate enriched in boron 10, installed the recirculation pump trip upon ATWS conditions feature, and refurbished analog trip units for the ECCS panels. Based upon review of this documentation the inspectors concluded the modifications have been implemented.

F.8 - Remove Reactor Vessel Head Spray Piping in Drywell and Seal Primary Containment Penetrations

TVA commitment item NCO 860095001 was written to remove the reactor vessel head spray piping in the drywell and seal the associated primary containment penetrations.

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This NCO was implemented with DCN 51151. A portion of this DCN removed the head spray nozzle piping, valves and associated wiring from the reactor vessel head to drywell penetration and eliminated the spray function. The inspectors reviewed the design change package, revised drawings, and visually verified field modifications. The inspector confirmed that valves FCV-74-78, 690, 691, 694, 695, 696, and 697 and associated wiring from the reactor vessel head (nozzle N6A) to the drywell penetration X-17 had been removed and penetration X-17 had been sealed. The inspectors confirmed that the Reactor Vessel Head Spray function had been removed.

F.9 - Implement the Hardened Wetwell Vent Modification.

TVA commitment item NCO 890245002 was written to add a Hardened Wetwell Vent. This NCO was implemented with DCN 51189 which added the Hardened Wetwell Vent piping, associated components and electrical modifications. This modification followed the NRC staff guidance described in Generic Letter (GL) 89-16, "Installation of a Hardened Wetwell Vent". In GL 89-16 the staff concluded that a reliable hardened wetwell vent allowed for consideration of coordinated accident management strategies by providing design capability consistent with safety objectives. The inspectors reviewed the design change package, system controls, operator training, post modification test results, and visually verified field installation. The inspectors concluded that this modification completed the implementation of recommendation (1) of GL 89-16 for the installation of improved Hardened Wetwell Vent capability.

F.10 - Cap Service Air and Demineralized Water Primary Containment Penetrations

TVA commitment item NCO 040006032 was written to Cap Service Air and Demineralized Water Primary Containment Penetrations prior to the restart of Unit 1. DCN 51183 isolated and capped the service air header piping remaining in drywell penetration X-21 on the reactor building side. DCN 51174 isolated and capped the demineralized water header piping remaining in drywell penetration X-2D on the reactor building side. The scope of this modification was expanded to include the removal of all service air piping in the drywell. It also removed flued head welds at the penetration. The inspectors reviewed the complete design change package, limited post modification test results, and all revised drawings. The inspectors also verified that unused Service Air and Demineralized Water piping and valves were removed from the drywell and the remaining piping was capped. The inspectors concluded that the Service Air and Demineralized Water systems no longer penetrated containment.

F.11 - Modify Auxiliary Decay Heat Removal (ADHR) System to Serve Unit 1

This modification to install ADHR service to Unit 1 was performed by DCN 51197 Rev. A. The inspectors reviewed the complete design change package and noted that the final testing of the new system had been deferred and was tracked with a punchlist item to do the testing at a later date. Licensee representatives stated that testing was deferred to preclude radioactively contaminating the new Unit 1 hookup piping, which is removable and for ALARA exposure considerations. They intend to hook up the piping and do the testing before the system is needed for Unit 1 service. The inspectors found

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this plan acceptable. The inspectors visually examined the permanently installed suction and discharge piping in the Unit 1 spent fuel pool and the location where the removable piping is hooked up. The inspectors were told that the removable piping had been successfully tested and had been stored in a container in the yard. The inspectors concluded that this modification had been implemented.

F.12 - Fully implement the Maintenance Rule; Unit 1's Temporary Exemption Ceases to be Effective

This item had been previously inspected by NRC report 50-259/2006-009. During this inspection the inspectors reviewed the document 0-TI-346, Maintenance Rule Performance Indicator Monitoring, Trending, and Reporting - 10CFR50.65, Rev. 28, dated 12/20/2006. The document contained the same Unit 1 implementation requirements as for Units 2 and 3. The inspectors discussed the issue with the system engineer responsible for maintenance rule oversight. The inspectors were shown computerized data sheets for tracking system performance monthly by system engineers and noted that monitoring data has already been entered for some Unit 1 systems. Other systems data will begin entry as the systems are declared operable. The inspectors concluded that the necessary plans are in place to fully implement the Maintenance Rule for Unit 1.

F.13 - Replace RWCU Piping Outside of Primary Containment with IGSCC Resistant Piping (Implement Actions Requested in GL 89-10 for RWCU)

This item had been previously inspected by NRC report 50-259/2005-008. For this inspection the inspectors reviewed DCN 51194 which replaces RWCU piping outside the drywell. Based on review of this document the inspectors concluded that the modification had been implemented.

B. Document Discrepancies

The inspectors identified several examples of inappropriate documentation practices in paper copies of modification packages in the document control center. Discrepancies observed were of the following nature:

Vault copy was missing a page, Attachment 10, which is the description of the modification being implemented. Licensee representatives were able to find the missing page in the computerized copy of the modification package.

Examples of data entries being made in pencil, obvious previous erasures with write overs.

Some entries lined through multiple times with no legible final entry, sideways and margin entries.

The inspectors selected two additional modification packages and reviewed them completely. The inspectors did not find similar poor record keeping practices in those

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packages so the inspectors concluded that the discrepancies were not pervasive. The licensee entered this issue into their corrective action system as Problem Evaluation Report (PER) number 123276 for resolution.

C. Tracking of License Renewal Commitments

The licensee has opened PER 89791 to track all outstanding commitments made to the NRC to support license renewal. The inspectors reviewed the PER to determine the status of actions that were committed to be done prior to Unit 1 restart. There were 10 items listed in the PER as prior to restart and all are listed in the PER as action status complete. All the items relate to the final implementation of the three-unit fire protection program, the EQ program, or the Maintenance rule program. At the completion of this inspection each of those programs were ready for implementation.

III. Conclusions

The inspection concluded that TVA has completed those commitments listed in Appendix F of the license renewal application as required by Condition 2.H of the renewed license. Those were the modifications TVA committed to make prior to Unit 1 restart to bring the Unit 1 CLB consistent with the CLB of Units 2 and 3.

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V. Management Meetings**X1 Exit Meeting Summary**

On April 13, 2007, the inspectors presented the inspection results to Mr. Brian O'Grady and other members of his staff, who acknowledged the findings. No proprietary information was reviewed during this inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

Enclosure

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel

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J. Burton, Design Manager
K. Brune, Corporate Engineering
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J. Davenport, Site Licensing
R. DeLong, Site Engineering
T. Elton, licensing Engineer
K. Groom, Site Engineering
D. Matherly, Performance engineer
B. O'Grady, Site Vice President
R. Sampson, Site Engineering
V. Schiavone, Site Engineering
R. Smith, Document Control
J. Valente, Engineering Manager, Unit 1
J. Wallace, Licensing Engineer
D. White, Site Quality Manager
A. Yarbrough, System Engineer

NRC personnel

W. Bearden, Senior Resident Inspector, Unit 1
E. Christnot, Resident Inspector
R. Monk, Resident Inspector
T. Ross, Senior Resident Inspector, Units 2 and 3

INSPECTION PROCEDURES USED

Temporary Instruction 2509/001 Unit 1 Followup Inspection Related to License Renewal
Application for the Browns Ferry Nuclear Plant, Units 1,2, and 3

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Closed

Temporary Instruction 2509/001

LIST OF DOCUMENTS REVIEWED

Documents Reviewed:

NCO 020065001, Evaluate and Modify, as Required, Main Steam Leakage Path Piping to Ensure Structural Integrity.

DCN 51112, Evaluate and Modify, as Required, Main Steam Leakage Path Piping to Ensure Structural Integrity.

NCO 860184001, Implement Containment Atmosphere Dilution System Modifications.

DCN 51201, Implement Containment Atmosphere Dilution System Modifications.

Unit 2/3 Fire Protection Report, Volume 1, Revision 39

3-Unit fire Protection Report, Revision 0

W84-061109-014 dated 11/9/2006, 10CFR 50.49 Baseline Data for System 74

DCN 51045 System 68 Reactor Recirculation

DCN 51194 Reactor Water Cleanup System 69

DCN 51193 IGSCC Inside RPV and Outside Drywell

DCN 51046 RWCU Inside Drywell

DCN 51151 RHR Inside Drywell System 74

DCN 51152 Core Spray Inside Drywell System 75

0-TI-365, Reactor Pressure Vessel Internals Inspection (RPVII), Rev. 23, dated 2/5/2007

General Electric Report IN Vessel Visual Inspection (IVVI) Phase 1 Final Report, Fall Cycle 6 Restart Outage

DCN 51240, Install Alternate Rod Insertion

DCN 51234, ATWS Recirculation Pump Trip

DCN 51243, Addition and Refurbishment of Analog Trip Units in ECCS Panels

NCO 860095001, Remove Reactor Vessel Head Spray Piping in Drywell and Seal Primary Containment Penetrations

DCN 51151, Remove Reactor Vessel Head Spray Piping in Drywell and Seal Primary Containment Penetrations

NCO 890245002, Add Hardened Wetwell Vent

DCN 51189, Hardened Wetwell Vent Piping, Associated Components and Electrical Modifications

NCO 040006032, Cap Service Air and Demineralized Water Primary Containment Penetrations prior to the restart of Unit 1

DCN 51183, Isolate and cap the service air header piping remaining in drywell penetration X-21 on the reactor building side.

DCN 51174, Isolated and capped the demineralized water header piping remaining in drywell penetration X-2D on the reactor building side.

DCN 51197 Rev. A. Modify Auxiliary Decay heat Removal System to Service Unit 1

0-TI-346, Maintenance Rule Performance Indicator Monitoring, Trending, and Reporting - 10CFR50.65, Rev. 28, dated 12/20/2006

PER 89791 License Renewal Commitment Tracking

Drawings Reviewed:

1-730E920 Sheet 19

1-47E801-1, Revision 005

1-47E801-1, Revision 007

1-47E807-2, Revision 004

1-791E234-6, Revision 1

1-45N1644-3 Revision 003

1-45N1749-12, Revision 000

1-45N1749-13, Revision 004

1-47E846-06, Revision 001

0-47E845-2, Revision 42

0-47E856-02, Revision 19 and Revision 21

1-47W400-1, Revision 0

0-47W491-7, Revision 011

0-47W491-9, Revision 002