Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

June 25, 2007

TVA-BFN-TS-461

10 CFR 50.90

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 No. 50-259
Tennessee Valley Authority	)	

BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 1 - EXIGENT TECHNICAL SPECIFICATIONS (TS) CHANGE TS-461 - MODIFICATION OF RESTART LARGE TRANSIENT TESTING LICENSE CONDITION 2.(G)2

Pursuant to 10 CFR 50.90, the Tennessee Valley Authority (TVA) is submitting a request for a license amendment (TS-461) to Operating License DPR-33 for BFN Unit 1. License condition 2.G(2) currently requires that a main steam isolation valve (MSIV) closure test and a turbine generator load reject from full power be performed prior to exceeding 30 days of plant operation above 3293 megawatt thermal power. This change is requesting a postponement of the subject load reject test from full power.

The full power MSIV closure transient test was performed on June 23, 2007, in accordance with the existing license condition 2.G(2). Regarding the subject turbine generator load reject test, on June 9, 2007, Unit 1 experienced an unplanned turbine trip and scram from 80 percent power. The integrated plant response to the trip was as expected and the transient was uneventful. Based on the favorable plant response to the unplanned turbine trip from 80 percent power and to the full power MSIV closure transient test, TVA is requesting that license condition 2.G(2) be modified to allow postponement of the performance of the full power turbine generator load reject

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transient test to before October 31, 2007, when power demands on the TVA offsite grid are reduced. The 30-day deadline in current license condition 2.G(2) will be reached in mid-July. Therefore, approval of this license condition change is requested by July 9, 2007. TVA implementation of the proposed amendment will be made upon NRC approval. Exigent approval of this proposed amendment would enable TVA to postpone the load reject test from a summertime period of high grid demand into the Fall of 2007 when system grid reserve power margins are higher. This request is consistent with recent NRC guidance on maintaining high grid reliability and also is of some economic benefit to TVA.

TVA has determined that there are no significant hazards considerations associated with the proposed amendment and that the change qualifies for a categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosures to the Alabama State Department of Public Health.

There are no new regulatory commitments associated with this submittal. If you have any questions about this submittal, please contact me at (256) 729-2636.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 25, 2007.

R. G. Jones
General Manager, Site Operations

Enclosures:
1. TVA Evaluation of the Proposed Change
2. Proposed License Condition Change (mark-up)
3. Plant Response - June 9, 2007 - Turbine Trip from 80 Percent Power

cc: See page 3

Enclosures
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Enclosure 1

Browns Ferry Nuclear Plant (BFN) Unit 1

Exigent Technical Specifications (TS) Change TS-461 Modification of Restart Large Transient Testing License Condition 2.G(2)

TVA Evaluation of the Proposed Change

1.0 DESCRIPTION

Pursuant to 10 CFR 50.90, the Tennessee Valley Authority (TVA) is submitting a request for a license amendment (TS-461) to Operating License DPR-33 for BFN Unit 1. The proposed amendment would modify Unit 1 license condition 2.G(2) to postpone the performance of a full power turbine generator load reject transient test to before October 31, 2007.

2.0 PROPOSED CHANGE

The proposed amendment would modify Unit 1 license condition 2.G(2) to postpone the performance of a full power turbine generator load reject transient test to before October 31, 2007. A marked-up Unit 1 license condition page is provided in Enclosure 2, which shows the proposed change.

3.0 BACKGROUND

On June 28, 2004, TVA submitted a Unit 1 license amendment request (TS change request No. 431) for extended power uprate (EPU) operation (ADAMS Accession No. ML04840109). The EPU amendment would increase the maximum authorized power level from the original licensed thermal power (OLTP) of 3293 megawatts thermal (MWt) to 3952 MWt, an approximate 20 percent increase in thermal power. This license amendment is still under NRC review.

In the course of the EPU amendment review, it became apparent that NRC concerns associated with the analysis of the Unit 1 steam dryer for 120 percent operations could not be resolved in a timeframe needed to support the planned restart of Unit 1 from its extended outage. This is due to length of time needed to instrument the steam lines and take in situ steam line data, to develop an acceptable steam dryer model, and to calculate steam dryer loads. These activities are in progress and the results will be submitted to NRC later this year.

On September 22, 2006, TVA submitted a supplemental TS change request (ML062680459), which revised the original June 28, 2004, Unit 1 EPU application to request approval of a 5 percent increase in thermal power over OTLP (i.e., 3293 MWt to 3458 MWt) until such time as the steam dryer analyses could be completed. A power level increase of this magnitude is traditionally referred to as a "stretch" power uprate. BFN Units 2 and 3 were previously licensed and each has operated for several years at this stretch power level (3458 MWt). This approach to EPU approval for Unit 1 provided a means for Unit 1 to restart from its extended outage with a 5 percent uprate in thermal power with the review of the remainder of the EPU application continuing in parallel.

The September 22, 2006, supplemental TS-431 request for operation at 3458 MWt was approved by NRC on March 6, 2007 (ML063350404) and included approved TS changes for the 5 percent increase in thermal power. This uprated power of 3458 MWt is referred to as the current licensed thermal power (CLTP) in the remainder of this letter. The NRC TS approval also contained two license conditions, 2.G(1) and 2.G(2), on conducting large transient tests. License condition 2.G(1) included a condensate pump trip, a condensate booster pump trip, and a main feedpump test from 100 percent CLTP. License condition 2.G(2) required the performance of a turbine generator load reject and a main steam isolation valve (MSIV) closure test from full power. License Condition 2.G(2) is repeated below for reference;

> During the power uprate power ascension test program and prior to exceeding 30 days of plant operation above a nominal 3293 megawatts thermal power level (100-percent OLTP) or within 30 days of satisfactory completion of steam dryer monitoring and testing that is necessary in order to achieve 105-percent OLTP (whichever is longer), with plant conditions stabilized at 105-percent OLTP, TVA shall perform a MS isolation valve closure test and a turbine generator load reject test. Following each test, TVA shall confirm that plant response to the transient is as expected in accordance with previously established acceptance criteria. The evaluation of the test results for each test shall be completed, and all discrepancies resolved, prior to resumption of power operation.

The turbine generator load reject and MSIV closure tests result in a reactor shutdown (auto-scram) from full power. As stated, the two license conditions are required to be fulfilled within 30 days of plant operation above OLTP (3293 MWt) power level.

BFN 1 restarted in late May 2007 and first achieved CLTP on June 8, 2007, after a period of fuel preconditioning. Power was then reduced to continue restart testing, and on June 9, 2007, Unit 1 experienced an unplanned turbine trip and scram from high power (approximately 80 percent CLTP) due to a moisture separator instrumentation problem. The moisture separator problem was remedied and Unit 1 resumed power operation on June 12, 2007.

The Unit 1 integrated plant response to the June 9, 2007, turbine trip was as expected and the scram was uneventful. Based on the favorable plant response to the unplanned turbine trip from 80 percent CLTP, TVA is requesting that license condition 2.G(2) be modified to allow postponement of the performance of the 100 percent turbine generator load reject transient test to before October 31, 2007, when power demands on the TVA grid are reduced. The full power condensate, condensate booster pump, and main feedpump trip tests, and the full power MSIV closure transient tests were performed on June 23, 2007, in accordance with the current existing license conditions. The Unit 1 integrated plant response to these transients was as expected and the scram and scram recovery response for the June 23, 2007, full power MSIV transient test was uncomplicated.

TVA requests exigent approval of this change since the 30-day provision in current license condition 2.G(2) will be reached in mid-July. The need for an exigent review was created by TVA's desire to use the unplanned turbine trip as a basis for deferring performance of the 100 percent CLTP load reject test from a summertime period of high system grid demand into the Fall of 2007 when grid system reserve margins are higher. Therefore, TVA is requesting this change be approved by July 9, 2007, with implementation of the amendment to be immediately upon NRC approval.

4.0 TECHNICAL ANALYSIS

BFN Unit 1 commenced start-up activities in late May 2007 after a lengthy outage. Descriptions of the return-to-service system testing plan, post-modification testing process, and power ascension testing programs for Unit 1 have been extensively described in several NRC submittals in support of the original EPU amendment request and Unit 1 restart. The overall objective of the Unit 1 test program is to provide a controlled and systematic return of the unit to service. The return-to-service and power ascension testing programs are similar to those successfully employed for the return of Units 2 and 3 to service from their extended outages. NRC reviewed the test plan and found it acceptable as summarized in Section 2.12 of the March 6, 2007, safety evaluation referenced in Section 3 above.

Unit 1 Restart Testing Program

Procedure 1-TI-319, Master Refueling Test Instruction, was established to provide a systematic and sequenced means to restart test Unit 1. The procedure ensures that core verification and all beginning-of-cycle tests are completed prior to commencing fuel loading and power operations for the Unit 1 restart. In addition, this procedure defined a refueling test program to verify the proper reconstruction of the reactor core and operation of equipment to meet regulatory requirements. This test procedure is in addition to TS required surveillance testing and other routine maintenance tests.

The test instruction is organized into several phases with milestones as follows;

- Fuel Load Testing up to Startup
- Zero Power - Reactor Startup Prerequisites
- Initial Critical
- Rated Temperature and Pressure
- Mode Switch to Run
- Raising Reactor Thermal Power from 40% to 55% CLTP
- Reactor Thermal Power from 55% to 80% CLTP
- Reactor Power to 100% CLTP

The test instruction specifies the testing to be performed at each phase, establishes acceptance criteria, and provides requisite steps for the review and management approvals to advance to the next testing phase. Dynamic testing includes control rod scram testing, actuation of reactor main steam safety relief valves (SRVs), high pressure coolant system injection tests, and turbine control and feedwater system testing and control system tuning. Several full power transient tests serve as the culmination of the restart program as captured in Unit 1 license conditions 2.G(1) and 2.G(2). These include a condensate pump trip, a condensate booster pump trip, and a main feedpump trip from full power, as well as a turbine generator load reject and a MSIV closure test from full power. The turbine generator load reject and MSIV closure transient tests result in a reactor shutdown (auto-scram). These transient tests demonstrate the combined integrated response of Unit 1 systems to transients that might be experienced during routine power operations.

June 9, 2007 - Unit 1 Turbine Trip Scram

Unit 1 went critical on May 22, 2007, first achieved CLTP on June 8, 2007, and was in the high power phases of the 1-TI-319 testing sequence on June 9, 2007, when an unplanned main turbine trip occurred from 80 percent power due to a moisture separator

instrumentation malfunction. The moisture separator problem was remedied and Unit 1 resumed power operation on June 12, 2007.

As discussed in Section 14.5.2.2 and 14.5.2.4 of the Updated Final Safety Analysis Report, turbine trips and generator load rejects are rapid reactor pressurization transients. The reactor pressurization rates are similar since the turbine stop valve and control valve closure times are both very fast. Above 30 percent reactor power, a turbine trip or load reject will initiate a direct reactor scram and trip both recirculation pumps.

Due to the scram and vessel pressurization, reactor water level will exhibit a sharp drop as voids collapse, then recover somewhat as the core revoids. From high power conditions with equilibrium decay heat, SRVs will briefly operate to relieve the initial pressurization increase caused by the rapid closure of the main turbine stop/control valves. After this initial pressurization, the turbine Electro-Hydraulic Control (EHC) system has the capacity to control reactor pressure via bypass valve operation to the condenser and the EHC system will quickly return reactor pressure to a zero turbine load pressure setting. The feedwater system should respond to the drop in vessel level and automatically return level to normal following the trip.

The Unit 1 reactor conditions at the time of the June 9, 2007, turbine trip were as follows;

Thermal Power - 2761 MWt (79.8% rated CLTP)
Reactor Core Flow - 81 million pounds/hour (79% rated)
Initial reactor pressure - 1020 psig
Feedwater temperature - 361.8°F

A post-trip analysis of the reactor response was performed in accordance with plant procedures. The post-trip analysis determined that the integrated plant response of the reactor shutdown systems and level/pressure control systems was as expected and the scram recovery actions following the turbine trip were uncomplicated. One malfunction was observed in that the D traversing incore probe failed to automatically withdraw and isolate. This problem has since been corrected.

Key observations of the post-trip analysis:

1) All control rods fully inserted
2) Both reactor recirculation pumps tripped as expected
3) Feedwater and turbine EHC system satisfactorily controlled reactor pressure and water level
4) Turbine bypass valves operated properly
5) Main condenser remained available as a heat sink throughout the event

6) Minimum reactor water level was approximately -5 inches (-40 inches from normal operating range)
7) Operation of the High Pressure Coolant Injection or the Reactor Core Isolation Coolant systems was not required
8) Peak recorded reactor pressure was 1099 psig (+79 psi)
9) No SRVs operated

A plot generated from the plant process computer showing reactor water level, average neutron power, and reactor pressure is provided in Enclosure 3. The plot shows the expected initial pressure increase and then return to normal. A smooth recovery of reactor water level is seen as the EHC/feedwater control system responded to the turbine trip and maintained reactor vessel level and pressure well within expected values. Peak reactor pressure was approximately 1099 psig, which is about 35 psig below the lowest set SRV; therefore, no SRVs lifted.

Due to a higher initial power level, a turbine trip or load reject from 100 percent CLTP would be nominally more severe than a turbine trip from 80 percent CLTP in terms of pressure increase. The integrated plant response, however, will be similar.

Comparison of June 9, 2007 Turbine Trip to Analytic Cases

For benchmarking, General Electric performed a turbine trip simulation using the plant parameters from the June 9, 2007, scram as initial conditions. For comparison purposes, a 100 percent CLTP turbine trip simulation was also performed.

The initial key parameters used in the two analytic cases are shown in Table 1. The inputs in Table 1 for the 80% case represent actual plant conditions for the June 9 turbine trip. The 100% CLTP case inputs are the nominal expected values for 100% power operation. For remaining input parameters such as bypass valve speed and control rod scram speed, the transient cases used conservative ODYN licensing inputs, so the analytic cases should overpredict the peak reactor pressure and minimum water level. Table 2 provides a comparison of the peak vessel pressure observed during the June 9, 2007, turbine trip with the 80% ODYN analytic case. The results of the 100% ODYN case are also shown.

Table 1 - Key Parameter Initial Conditions For Turbine Trip Cases

Parameter	Based on Plant Event (80% Power)	100% Power Case
Reactor Power (MWt)	2761	3458
Reactor Power (% of Rated)	79.8	100
Core Flow (% of Rated)	79.0	95.9
Reactor Pressure (psia)	1035	1050
Feedwater Temperature (°F)	361.8	381.7
Initial Water Level (inches NR)	36.5	36.5

Table 2 - Comparison of Turbine Trip Cases

Parameter	Plant Event	80% Power ODYN Case	100% Power ODYN Case
Peak Reactor Pressure Increase (psi)	79	86	117
Minimum Reactor Water Level (inches from vessel zero reference)	-5	-15	-15

The ODYN simulation of the plant event predicts larger changes in reactor pressure and level than were actually observed. This is expected with the ODYN licensing basis model assumptions. The ODYN model predicted a vessel pressure change of about 86 psi, while the plant recorded a pressure change of approximately 79 psi. The ODYN model predicted a minimum water level approximately 15 inches below narrow range (NR) instrument zero, while the plant recorded a level drop to approximately 5 inches below NR instrument zero. Though conservative, the ODYN results are reasonably close to the observed values of the actual plant event.

The results for the 100% CLTP turbine trip case are also shown in Table 2. The largest difference in predicted response is in the calculated vessel pressure rise. At 100% power, the reactor pressurization rate will be higher since there is a larger mismatch between the vessel steaming rate and the turbine bypass valve capacity. ODYN predicts the vessel pressure to increase about 117 psi, which is above the lowest set group of reactor SRVs (1035 psig). Therefore, in the ODYN case, SRVs open very briefly (~2 sec) after which the turbine bypass system has the capacity to control reactor pressure. Both analysis cases showed a similar water level decrease due to the scram and initial reactor pressurization. The minimum level was very similar for both simulations with a minimum vessel level approximately 15 inches below instrument zero.

Performance of MSIV Isolation Test

As previously stated, a full power MSIV closure transient test was performed on June 23, 2007, in accordance with the existing license condition 2.G(2). The MSIV closure test from full power constitutes a challenging transient event since all four main steam lines are simultaneously isolated from the condenser system during the test.

The Unit 1 integrated plant response to the scram and scram recovery from the June 23, 2007, full power MSIV transient test was uneventful. This MSIV transient test provides another demonstration of proper integrated reactor system response in addition to that already demonstrated during the June 9, 2007, 80 percent CLTP turbine trip.

Regulatory Guidance on Avoiding Challenges to the Power Grid

The request for test postponement is consistent with recent NRC guidance provided in NRC Regulatory Issue Summary 2004-05, Grid Reliability and the Impact on Plant Risk and the Operability of Offsite Power, and in Generic Letter 2006-02, Grid Reliability and the Impact on Plant Risk and the Operability of Offsite Power. These publications stress the importance of maintaining stable grid conditions and managing the risk of activities that potentially represent challenges to the offsite power system. Although the TVA offsite power system is fully capable of accommodating a single unit load reject from 100 percent CLTP under summer grid conditions, there is general good operating practice merit in performing the test in the Fall when power reserve margins are greater.

Summary

The combination of the June 23, 2007, MSIV full isolation trip and the June 9, 2007, turbine trip from 80 percent CLTP satisfactorily demonstrates the integrated response of BFN Unit 1 to plant pressurization transients. Additionally, a fuel vendor analysis simulation of the turbine trip shows that the reactor response is consistent with the vendor code predictions. The plant response to the planned 100 percent CLTP generator load reject test is expected to be similar to that already demonstrated during the June 9, 2007, turbine trip from 80 percent power. Since the full power load reject test is expected to simply reaffirm satisfactory safety system performance and reactor level/pressure control systems performance from a nominally higher power level, a postponement of the 100 percent CLTP load reject test to a period of time when offsite power system operating margins are higher is justified and is prudent operating practice.

5.0 REGULATORY SAFETY ANALYSIS

The Tennessee Valley Authority (TVA) is submitting a proposed amendment which modifies Unit 1 license condition 2.G(2) to postpone the current requirement to conduct a full power turbine generator load reject test from summertime into the Fall of 2007 when offsite power system operating margins are higher.

5.1 No Significant Hazards Consideration

TVA has evaluated whether or not a significant hazards consideration is involved with the proposed change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. Does the proposed Technical Specification change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The requested licensing action would delay the current license condition schedule requirement to perform a full power turbine generator load reject transient test. No other changes are proposed. This proposed licensing action will not affect any system, structure, or component designed for the mitigation of previously analyzed events. Therefore, the proposed change does not involve an increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed Technical Specification change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The requested licensing action would delay the current schedule requirement to perform a full power turbine generator load reject transient test. No other changes are proposed. Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed Technical Specification change involve a significant reduction in a margin of safety?

Response: No

Performance of these specific large transient tests is not

necessary to ensure acceptable plant operation at the higher thermal power level. Simple, integrated systems tests have been performed, and a turbine trip from a high power and a main steam isolation valve transient test from full power have been experienced. In addition, other testing has been performed which demonstrated the satisfactory performance of individual components and subsystems. Thus, the proposed delay of the load reject transient test will not significantly reduce any margin of safety.

Based on the above, TVA concludes that the proposed TS change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

10 CFR 50, Appendix B, Criterion XI, "Test Control" specifies that a testing program be established that demonstrates that plant systems will perform satisfactorily in service and that written test procedures are developed which incorporate the requirements and acceptance limits contained in applicable design documents. As discussed in the previous sections, TVA believes that performance of the subject transient test prior to exceeding 30 days of plant operation above a nominal 3293 megawatt thermal power is not necessary to demonstrate acceptable plant operation. Accordingly, applicable regulatory requirements and criteria will continue to be met.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed TS changes would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed TS changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed TS change.

Enclosure 2

Browns Ferry Nuclear Plant (BFN) Unit 1

Exigent Technical Specifications (TS) Change TS-461
Modification of Restart Large Transient
Testing License Condition 2.G(2)

Proposed Licensed Condition Change (mark-up)

G. (1) During the power uprate power ascension test program and prior to exceeding 30 days of plant operation above a nominal 3293 megawatts thermal power level (100-percent OLTP) or within 30 days of satisfactory completion of steam dryer monitoring and testing that is necessary for achieving 105-percent OLTP (whichever is longer), with plant conditions stabilized at 105-percent OLTP, TVA shall trip a condensate booster pump, a condensate pump, and a main feedwater pump on an individual basis (i.e., one at a time). Following each pump trip, TVA shall confirm that plant response to the transient is as expected in accordance with previously established acceptance criteria. Evaluation of the test results for each test shall be completed and all discrepancies resolved in accordance with corrective action program requirements and the provisions of the power ascension test program.

Additionally, by October 31, 2007, TVA shall perform a turbine generator load reject test with plant conditions stabilized at 105-percent OLTP.

(2) During the power uprate power ascension test program and prior to exceeding 30 days of plant operation above a nominal 3293 megawatts thermal power level (100-percent OLTP) or within 30 days of satisfactory completion of steam dryer monitoring and testing that is necessary in order to achieve 105-percent OLTP (whichever is longer), with plant conditions stabilized at 105-percent OLTP, TVA shall perform a MS isolation valve closure test ~~and a turbine generator load reject test~~. Following each test, TVA shall confirm that plant response to the transient is as expected in accordance with previously established acceptance criteria. The evaluation of the test results for each test shall be completed, and all discrepancies resolved, prior to resumption of power operation.

H. The licensee must complete the thirteen (13) Unit 1 restart commitments that are discussed in Appendix F of the license renewal application, dated December 31, 2003, as supplemented by letters dated January 31, 2005, March 2, and April 21, 2006. Completion of these activities must be met prior to power operation of Unit 1.

I. This renewed license is effective as of the date of issuance and shall expire midnight on December 20, 2033.

FOR THE NUCLEAR REGULATORY COMMISSION

Original Signed By
J. E. Dyer
J. E. Dyer, Director
Office of Nuclear Reactor Regulation

Attachments:
1. Unit 1 - Technical Specifications - Appendices A and B

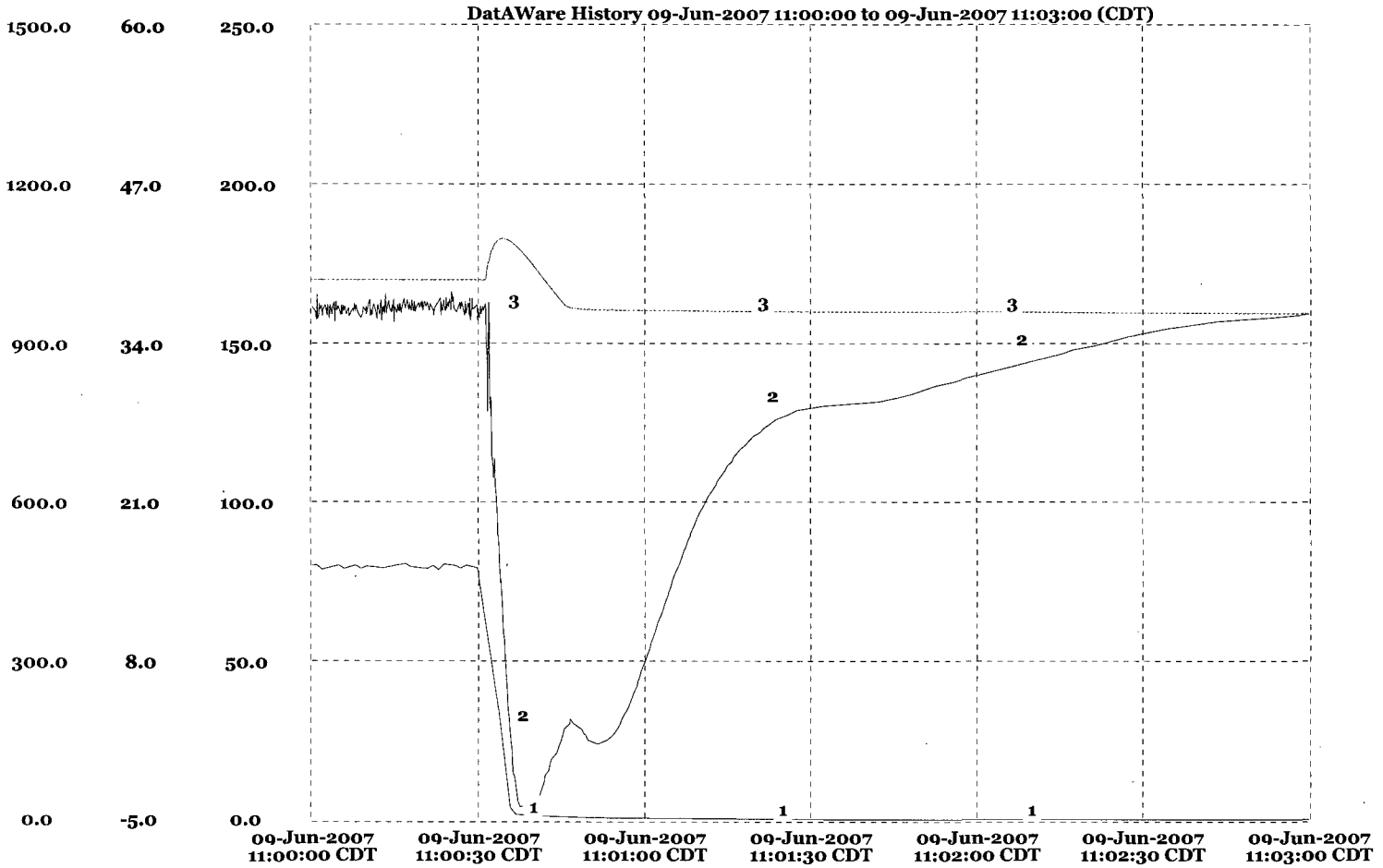
Date of Issuance: May 4, 2006

Enclosure 3

Browns Ferry Nuclear Plant (BFN) Unit 1

Exigent Technical Specifications (TS) Change TS-461
Modification of Restart Large Transient
Testing License Condition 2.G(2)

Plant Response - June 9, 2007 - Turbine Trip from
80 Percent Power



Description	Low-Y	Hi-Y	Units
(1) 92-ANA01 (B1:U1) APRM 1 FLUX	0	250	%
(2) 3-203A (B1:U1) REACTOR WATER LEVEL A	-5	60	IN
(3) 3-204A (B1:U1) REACTOR PRESSURE A	0	1500	PSIG