

November 24, 2008

MEMORANDUM TO: Eva A. Brown, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Tracy J. Orf, Project Manager /RA/
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: BROWNS FERRY, UNITS 1, 2, AND 3 - REVIEW OF THE SUMMARY
REPORT FOR UPDATED FINAL SAFETY ANALYSIS REPORT
CHANGES (TAC NOS. MD8794, MD8795, AND MD8796)

This memorandum documents the in-office review of the summary report for Browns Ferry Nuclear Plant, Units 1, 2, and 3. By letter dated November 28, 2007, Tennessee Valley Authority (TVA) submitted the summary report required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.59(d)(2) of changes, tests, and experiments with safety evaluations prepared for design changes, revisions to plant procedures (new and revised), temporary alterations, and other activities completed during the period of July 1, 2006, through June 30, 2007. The report included summaries of 70 safety evaluations conducted under 10 CFR 50.59.

A detailed review of all 10 CFR 50.59 evaluations was not conducted. In accordance with the current policy stated in the DORL Handbook:

Under the current Reactor Oversight Process, Region-based inspectors have been given the responsibility to perform an inspection module/procedure on facility changes made by licensees without prior Nuclear Regulatory Commission approval in accordance with 10 CFR 50.59. Consequently, DORL Project Managers are currently not performing these reviews.

While not required, the safety evaluation summaries were evaluated to determine if the changes met the general screening requirements of 10 CFR 50.59(c)(2). During this review, Amendment No. 22 to the Updated Final Safety Analysis Report (UFSAR) was referenced to evaluate the impact of the change on the associated systems. The staff noted that, in general, the 10 CFR 50.59 summaries provided sufficient detail to determine that the licensee's conclusions appear reasonable and that the changes did not require NRC approval before implementation.

While all 70 safety evaluations were subjected to this process, four evaluations were subjected to a more detailed review. These two evaluations were selected based on wording within the summary report that called into question the effectiveness of the 10 CFR 50.59 evaluation performed by the licensee. After discussions with TVA, copies of the complete 10 CFR 50.59 evaluations were requested from TVA and were reviewed along with the UFSAR. Following this more detailed review, it was determined that these changes did not require NRC approval before implementation.

Docket Nos. 50-259, 50-260, and 50-296

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