



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

January 14, 2009

TVA-BFN-TS-463-T

10 CFR 50.90

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop: OWFN P1-35  
Washington, D.C. 20555-0001

In the Matter of  
Tennessee Valley Authority

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Docket No. 50-260

**BROWNS FERRY NUCLEAR PLANT (BFN) - TVA RESPONSE TO NRC QUESTIONS  
REGARDING UNIT 2 TECHNICAL SPECIFICATIONS (TS) CHANGE 463-T  
ONE-TIME EXTENSION OF SURVEILLANCE REQUIREMENTS (SRs)**

By letter dated December 22, 2008 (ML083650109), TVA submitted a request for a temporary TS change (TS-463-T) for BFN Unit 2. The proposed TS change requested an extension of certain SR frequencies on a one-time basis. Subsequent to the submittal TVA received NRC review questions by email, and the NRC and TVA addressed these questions in a conference call conversation on January 9, 2009. This letter documents the TVA response to the questions.

The NRC questions pertained to the non-use of accident inaccuracies in the allowable value (AV) calculations for the 2-SR-3.3.4.2.3(A, B, C, & D) instrumentation loops. TVA reviewed the design and licensing bases and confirmed that these instrument loops are associated only with special events and are thus not required to support a design basis accident. Therefore, the setpoint calculations for these loops are not required to add accident inaccuracies in the AV calculations.

As supporting information, calculation ND-Q0003-870006, Master Component Electrical List for the Feedwater System (003), does not list these instruments, pressure transmitters 2-PT-3-204A, -204B, -204C and -204D, as required for any type of accident (e.g., such as a loss-of-coolant accident or a high energy line break inside or outside of primary containment). Setpoint and scaling calculation ED-N2003-920049 identifies these instruments as not being required for any design bases accidents.

ADD  
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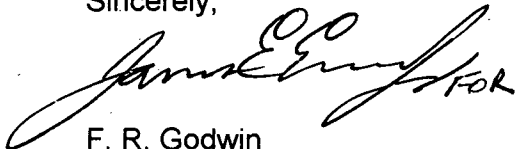
Therefore, the design basis accident inaccuracy is appropriately not included in the calculations for these loops. All other inaccuracies are included conservatively as measurable inaccuracies and are used in the calculation of the AV.

This response does not alter the original determination that there are no significant hazards considerations associated with the proposed changes, nor does it alter the originally submitted environmental assessment and finding of no significant impact provided by the December 22, 2008 letter. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter to the Alabama State Department of Public Health.

If you have any questions about this response or the requested TS change, please contact me at (256)729-2636.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 14, 2009

Sincerely,

A handwritten signature in black ink, appearing to read "F. R. Godwin", with a stylized flourish at the end.

F. R. Godwin  
Manager of Licensing  
and Industry Affairs

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