



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

January 9, 2009

TVA-BFN-TS-418
TVA-BFN-TS-431

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)	Docket Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

BROWNS FERRY NUCLEAR PLANT (BFN) – UNITS 1, 2, AND 3 – TECHNICAL SPECIFICATIONS (TS) CHANGES TS-418 AND TS-431 – EXTENDED POWER UPRATE (EPU) – RESPONSE TO ROUND 23 REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING STEAM DRYER ANALYSIS SUBMODELING (TAC NOS. MD5262, MD5263, AND MD5264)

By letters dated June 28, 2004 and June 25, 2004 (ADAMS Accession Nos. ML041840109 and ML041840301), TVA submitted license amendment applications to NRC for the EPU of BFN Unit 1 and BFN Units 2 and 3, respectively. The proposed amendments would change the operating licenses to increase the maximum authorized core thermal power level of each reactor by approximately 14 percent to 3952 megawatts.

Enclosure 1 provides the responses for three draft Round 23 RAIs regarding submodeling associated with the steam dryer analyses for EPU (EMCB.201/162, EMCB.166, and EMCB.167). The schedule for providing the remainder of the responses to the draft Round 23 RAIs is being developed and will be discussed with the NRC staff. As referred to in the responses to the RAIs, Enclosure 2 provides Revision 1 of Calculation Package 0006982.304, "Comparison Study of Substructure and Submodel Analysis using ANSYS," and Enclosure 3 provides the "Evaluation of Submodel Approach used in CDI Report 08-20P."

Note that Enclosure 1 contains information that Continuum Dynamics, Inc. (CDI) considers to be proprietary in nature and subsequently, pursuant to 10 CFR 2.390(a)(4), CDI requests that such information be withheld from public disclosure. Enclosure 5 provides an affidavit from CDI supporting this request. Enclosure 4 contains the redacted version of the proprietary enclosure with the CDI proprietary material removed, which is suitable for public disclosure.

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TVA has determined that the additional information provided by this letter does not affect the no significant hazards considerations associated with the proposed TS changes. The proposed TS changes still qualify for a categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9).

No new regulatory commitments are made in this submittal. If you have any questions regarding this letter, please contact me at (256)729-2636.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of January, 2009.

Sincerely,



F. R. Godwin
Manager of Licensing
and Industry Affairs

Enclosures:

1. Response to Round 23 Request for Additional Information (RAI) Regarding Steam Dryer Analysis Submodeling (Proprietary Version)
2. Structural Integrity Associates, Inc. Calculation Package 0006982.304, Revision 1, "Comparison Study of Substructure and Submodel Analysis using ANSYS"
3. Evaluation of Submodel Approach used in CDI Report 08-20P
4. Response to Round 23 Request for Additional Information (RAI) Regarding Steam Dryer Analysis Submodeling (Non-proprietary Version)
5. CDI Affidavit

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Enclosures

cc (Enclosures):

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