



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

October 29, 1996

10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)	Docket Nos.	50-259
Tennessee Valley Authority)		50-260
			50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - GENERIC LETTER (GL)
92-08 - THERMO-LAG 330-1 FIRE BARRIERS (TAC NOS. M85523,
M85524, M85525)**

As a result of review of previous submittals to NRC, TVA identified that some submittals in response to GL 92-08 were not submitted under oath or affirmation. This letter is being issued to certify TVA's previous correspondence, which replied to GL 92-08.

In a letter dated May 10, 1993, (Reference 1) TVA provided the initial reply to GL 92-08. In that letter, TVA requested an exemption from 10 CFR 50, Appendix R requirements for Residual Heat Removal Service Water power cables in the Intake Pumping Station. In the letter, TVA notified the staff of its intent to implement modifications that would allow BFN to comply with Section III.G of Appendix R without the use of Thermo-Lag fire barrier systems. NRC denied TVA's exemption request and sought additional information with regard to BFN's approach to the Thermo-Lag issue in a letter issued January 18, 1994 (Reference 2).

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TVA provided additional information in a letter issued March 10, 1994 (Reference 3). TVA committed to make the necessary modifications to bring the RHRSW system power cables into compliance with Appendix R by July 26, 1995.

TVA informed NRC of a Thermo-Lag related problem affecting one of the 4kV shutdown boards identified during closure of Unit 2 Cycle 6 Outage in a letter issued July 1, 1993 (Reference 4). In that letter, TVA committed to install isolation fuses in an AC power circuit and a fire watch would be maintained in the affected area until the modification could be implemented. This problem was resolved by a modification during Unit 2 Cycle 7 Refueling Outage.

In a separate letter issued December 22, 1994 (Reference 5), NRC requested additional information regarding measures TVA was taking to ensure the Thermo-Lag material used at BFN conforms to NRC regulations. TVA provided that additional information in a letter issued March 22, 1995 (Reference 6). In that letter, TVA committed to replace the Thermo-Lag in the Intake Pumping Station with new qualified material from the Watts Bar Testing Program prior to performance of Unit 3 Reactor Pressure Vessel Hydrostatic testing. TVA informed NRC of completion of the modification activities necessary to replace the Thermo-Lag in the Intake Pumping Station in a letter issued November 17, 1995 (Reference 7).

Generic Letter 92-08 required TVA to submit correspondence regarding this matter under oath or affirmation per 10 CFR 50.54(f). TVA failed to issue the letters dated May 10, 1993 (Reference 1), March 10, 1994 (Reference 3), and July 1, 1993 (Reference 4) under oath or affirmation. By this letter, TVA hereby notifies NRC that the statements made in these referenced letters with regard to GL 92-08, were true as if made under oath or affirmation.

There are no commitments made in this letter. If you have any questions regarding this matter, please contact me at (205) 729-2636.

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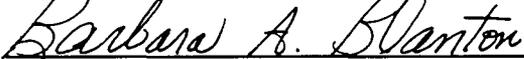
Sincerely,



T. E. Abney
Manager of Licensing
and Industry Affairs

cc: See page 5

Subscribed and sworn before me
on this 28th Day of October 1996.



Notary Public

My Commission Expires 10/06/98

My Commission Expires _____ .

- References:
1. TVA letter to NRC, dated May 10, 1993, Generic Letter (GL) 92-08 - Thermo-Lag 330-1 Fire Barriers, Revision 1
 2. NRC letter to TVA, dated January 18, 1994, Denial of Exemption from Section III.G of Appendix R to 10 CFR Part 50 and Request For Additional Information.
 3. TVA letter to NRC, dated March 10, 1994, Response to Nuclear Regulatory Commission (NRC) Request for Additional Information Regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers"
 4. TVA letter to NRC, dated July 1, 1993, Generic Letter (GL) 92-08 - Thermo-Lag 330-1 Fire Barriers, Revision 1 (Supplement)
 5. NRC letter to TVA, dated December 22, 1994, Request for Additional Information Regarding Generic Letter 92-08, Issued Pursuant to 10 CFR 50.54(f)
 6. TVA Letter to NRC, dated March 22, 1995, Request for Additional Information (RAI) Information Regarding Generic Letter (GL) 92-08, "Thermo-Lag 330-1 Fire Barriers"
 7. TVA Letter to NRC, dated November 17, 1995, Browns Ferry Nuclear Plant (BFN) - Completion of Unit 3 Restart Issues

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cc: Mr. Mark S. Lesser, Branch Chief
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