



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-15-070

May 29, 2015

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Subject: **Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Withdrawal of Proposed Technical Specification Change to Revise the Leakage Rate Through MSIVs - TS-485**

- References:
1. Letter from TVA to NRC, "Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Proposed Technical Specification Change to Revise The Leakage Rate Through MSIVs - TS-485," dated November 22, 2013 (ML14015A403)
 2. Letter from TVA to NRC, "Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3 - Supplement to Proposed Technical Specification Change to Revise the Leakage Rate Through MSIVs (TS-485)," dated January 29, 2015 (ML15030A499)
 3. Letter from TVA to NRC, "Updated Reply to Notice of Violation; EA-11-252; and Follow-up to 10 CFR 50.9, 'Completeness and accuracy of information,' Notification," dated August 30, 2013 (ML13268A421)
 4. Letter from NRC to TVA, "Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Request for Additional Information Regarding License Amendment Request to Revise Main Steam Isolation Valve Leakage (TAC Nos. MF3124, MF3125, and MF3126)," dated April 8, 2015 (ML15091A684)

By letter dated November 22, 2013 (Reference 1), and supplemented by letter dated January 29, 2015 (Reference 2), Tennessee Valley Authority (TVA) submitted a license amendment request (LAR) for Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3. The amendment proposed making the primary alternate leakage (ALT) pathway become the secondary pathway and the secondary pathway would become the credited primary ALT pathway. Additionally, the individual leakage and combined leakage rates through each MSIV would be decreased.


The Reference 1 LAR TS-485 was submitted to NRC to resolve the existing non-conforming / degraded condition, as committed by TVA in Enclosure 2 of Reference 3. Since the submittal of the Reference 1 LAR, TVA has responded to several NRC requests for additional information (RAIs). On March 18, 2015, TVA met with NRC in a closed meeting to discuss a then-draft RAI from the Radiation Protection and Consequences Branch (ARCB). As a result of that discussion and the subsequent transmittal of the formal RAI (Reference 4), TVA has elected to withdraw LAR TS-485.

Consequently, to resolve the existing non-conforming/degraded condition, TVA intends to perform facility and licensing basis modifications under 10 CFR 50.59 such that the current licensing basis dose calculations would remain valid. TVA will revise the Reference 3 reply to the Notice of Violation to detail these modifications and include a schedule for when the plant will be in conformance with its licensing basis. Status of the progress towards resolving the non-conformance will be provided to the NRC in an annual letter beginning one year from the date of this letter and continuing until the non-conformance has been resolved.

There are two new regulatory commitments contained in this submittal. Please address any questions regarding this submittal to Mr. Edward Schrull at (423) 751-2687.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 29th day of May 2015.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

Enclosure:

List of Regulatory Commitments

cc (Enclosure):

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
State Health Officer, Alabama Department of Public Health

ENCLOSURE

List of Regulatory Commitments

1. TVA will revise the reply to the Notice of Violation (Letter from TVA to NRC, "Updated Reply to Notice of Violation; EA-11-252; and Follow-up to 10 CFR 50.9, 'Completeness and accuracy of information,' Notification," dated August 30, 2013) to detail the facility modifications such that the licensing basis dose calculations would remain valid and include a schedule for when the plant will be in conformance with its licensing basis. Due date - July 15, 2015.
2. TVA will provide an annual status letter to update the NRC on progress of facility modifications until all modifications are complete. First due date - May 29, 2016.