

## NRR-PMDAPEm Resource

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**From:** Saba, Farideh  
**Sent:** Wednesday, September 02, 2015 1:47 PM  
**To:** Williams, Gordon Robert (grwilliams1@tva.gov)  
**Cc:** Schrull, Edward Dustin (edschrull@tva.gov); Hon, Andrew; Tilton, Caroline  
**Subject:** RAI for Browns Ferry Units 1, 2, and 3 Adoption of TSTF-501 (MF5417, MF5418, MF5419)  
**Attachments:** MF5417-9 BFN 1-3 RAI TSTF-501.docx

**Importance:** High

Gordon,

By letter dated December 11, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14349A694), Tennessee Valley Authority (TVA) (the licensee) submitted a license amendment request (LAR) regarding Browns Ferry Nuclear Plant (BFN), Units 1, 2 and 3 Facility Operating Licenses. The proposed changes would revise TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," consistent with Technical Specifications Task Force Traveler (TSTF) 501, Revision 1, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control." The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has determined that additional information below is needed to complete its review.

Attached please find the NRC staff's RAI on the subject LAR. As we agreed, please provide TVA response to the NRC staff request for additional information (RAI) by October 2, 2015.

Thank you,

Farideh  
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**Subject:** RAI for Browns Ferry Units 1, 2, and 3 Adoption of TSTF-501 (MF5417, MF5418, MF5419)  
**Sent Date:** 9/2/2015 1:47:25 PM  
**Received Date:** 9/2/2015 1:47:25 PM  
**From:** Saba, Farideh

**Created By:** Farideh.Saba@nrc.gov

**Recipients:**

"Schrull, Edward Dustin (edschrull@tva.gov)" <edschrull@tva.gov>

Tracking Status: None

"Hon, Andrew" <Andrew.Hon@nrc.gov>

Tracking Status: None

"Tilton, Caroline" <Caroline.Tilton@nrc.gov>

Tracking Status: None

"Williams, Gordon Robert (grwilliams1@tva.gov)" <grwilliams1@tva.gov>

Tracking Status: None

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MF5417-9 BFN 1-3 RAI TSTF-501.docx		35551

**Options**

**Priority:** High

**Return Notification:** No

**Reply Requested:** Yes

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

REQUEST FOR ADDITIONAL INFORMATION (RAI)  
LICENSE AMENDMENT REQUEST TO ADOPT TSTF-501  
TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT UNITS 1, 2 AND 3  
DOCKET NOS. 50-259, 50-260, AND 50-296  
(TAC NOS. MF5417, MF5418, MF5419)

By letter dated December 11, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14349A694), Tennessee Valley Authority (TVA) (the licensee) submitted a license amendment request (LAR) regarding Browns Ferry Nuclear Plant (BFN), Units 1, 2 and 3 Facility Operating Licenses. The proposed changes would revise TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air," consistent with Technical Specifications Task Force Traveler (TSTF) 501, Revision 1, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control." The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the submittal and has determined that additional information below is needed to complete its review.

Basis for the Request

Enclosure 1 of the licensee's submittal, page 3 of 9 states:

A change to TS 5.5.9 "Diesel Fuel Oil Testing Program" is proposed to adopt the testing of new fuel oil consistent with NUREG-1433, Revision 4. This change adds a requirement to test new fuel oil to a set of standards and limits and is a more restrictive change to support the adoption of TSTF-501, Revision 1. The periodicity of testing the 7-day storage tank fuel oil particulate concentration has been retained from the BFN Current Licensing Basis as every 92 days, consistent with ASTM D-2276, Method A-2 or A-3.

In addition, the licensee's proposed TS change to TS 5.5.9 states the following:

- c. Total particulate concentration of the fuel oil in the 7-day storage tank is  $\leq$  10 mg/l when tested every 92 days.

Technical Specification (TS) 5.5.10, "Diesel Fuel Oil Testing Program," of NUREG-1433, Revision 4, "Standard Technical Specifications (STS) BWR/4 Plants" establishes the following acceptance criteria for the total particulate concentration of the fuel oil:

ENCLOSURE

- c. Total particulate concentration of the fuel oil is  $\leq 10$  mg/l when tested every 31 days.

In addition, the licensee's proposed TS Bases change to SR 3.8.3.3 proposes the following:

Particulate concentrations should be determined in accordance with ASTM D6217-11 (Ref. 7). This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l.

The equivalent NUREG-1433, Revision 4, "Standard Technical Specifications (STS) BWR/4 Plants" Bases to SR 3.8.3.3 states the following:

Particulate concentrations should be determined in accordance with ASTM D5452-[ ] (Ref. 6). This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l.

#### RAI-1

Provide the documentation that establishes the current licensing basis for the periodicity of testing the 7-day storage tank fuel oil particulate concentration as every 92 days versus 31 days as suggested in STS.

#### RAI-2

Provide a justification for deviation for determining particulate concentrations of the fuel oil in accordance with ASTM D6217-11 versus ASTM D5452-[ ] as suggested in STS.