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 FACIL: 50-259 Browns Ferry Nuclear Power Station, Unit 1, Tennessee 05000259
 50-260 Browns Ferry Nuclear Power Station, Unit 2, Tennessee 05000260
 50-296 Browns Ferry Nuclear Power Station, Unit 3, Tennessee 05000296

AUTH. NAME WISENBURG, M. AUTHORITY AFFILIATION Tennessee Valley Authority
 RECIP. NAME IPPCLITO, T.A. RECIPIENT AFFILIATION Operating Reactors Branch 2

SUBJECT: Submits info re 810909 license amend application requesting Tech Spec changes to extend exposure range of fuel presently loaded in core. Based on GE 810506 & 28 ltr, MAPLHGR penalties should not be applied at facilities.

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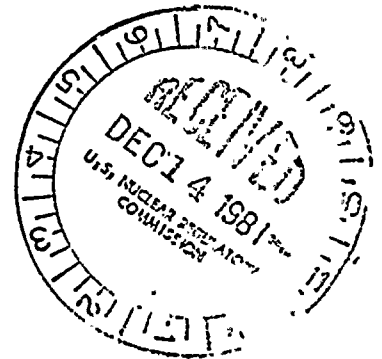
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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

December 11, 1981

Director of Licensing
Attention: Thomas A. Ippolito, Chief
Operating Reactor Branch No. 2
U.S. Nuclear Regulatory Commission
Washington, DC 20555



Dear Mr. Ippolito:

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

By L. M. Mills' letter to H. R. Denton dated September 9, 1981 we submitted request for license amendment TVA BFNP TS 165 for the Browns Ferry Nuclear Plant unit 2. That request proposed technical specification changes to extend the exposure range of the fuel presently loaded in the core. We have been requested by R. J. Clark of your staff to provide information regarding the applicability to Browns Ferry of certain letters from the General Electric Company (GE) to the NRC concerning fission gas release penalties.

By letters from R. E. Engel (GE) to you dated May 6 and May 28, 1981, GE responded to NRC concerns regarding the need for MAPLHGR limit penalties for nodal fuel bundle exposures greater than 22,000 Mwd/t to account for fission gas release. GE believes these letters contain adequate technical justification for the elimination of any NRC fission gas release penalties for MAPLHGR's calculated with current models for the Browns Ferry units. We concur with GE's conclusion that these letters are applicable to Browns Ferry units 1, 2, and 3. Therefore, there should be no reason for any MAPLHGR penalties to be applied.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

M. R. Wisenburt
M. R. Wisenburt
Nuclear Engineer

Subscribed and sworn to
before me this 11th day of December 1981.

Paulette W. White
Notary Public

My Commission Expires 9-5-84

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