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 50-260 Browns Ferry Nuclear Power Station, Unit 2, Tennessee 05000260  
 50-296 Browns Ferry Nuclear Power Station, Unit 3, Tennessee 05000296

AUTH. NAME AUTH. AFFILIATION  
 MILLS, L.M. Tennessee Valley Authority  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Respond to Generic Ltr 84-11, "Insp of BWR Stainless Steel Piping." Response addresses scope & schedule of future pipe insps, examiner qualification & availability, primary sys leak detection surveillance measures & compensatory actions.

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NOTES: NMSS/FCAF 1cy. 1cy NMSS/FCAF/PM. 05000259  
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	REG FILE 04	1 1	RGN2	1 1
EXTERNAL:	ACRS 16	10 10	LPDR 03	1 1
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NOTES:		2 2		

1. The first part of the report is a summary of the work done during the year. It is a brief statement of the results of the work, and is intended to give a general idea of the progress made.

2. The second part of the report is a detailed account of the work done during the year. It is a full and complete statement of the work, and is intended to give a full and complete account of the work done.

3. The third part of the report is a statement of the results of the work. It is a full and complete statement of the results of the work, and is intended to give a full and complete account of the results of the work.

4. The fourth part of the report is a statement of the conclusions reached. It is a full and complete statement of the conclusions reached, and is intended to give a full and complete account of the conclusions reached.

5. The fifth part of the report is a statement of the recommendations made. It is a full and complete statement of the recommendations made, and is intended to give a full and complete account of the recommendations made.

6. The sixth part of the report is a statement of the conclusions reached. It is a full and complete statement of the conclusions reached, and is intended to give a full and complete account of the conclusions reached.

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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

June 7, 1974

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

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

Enclosed is the response to Generic Letter No. 84-11 dated April 19, 1984, subject, Inspections of BWR Stainless Steel Piping, for the Browns Ferry Nuclear Plant. As requested in the generic letter, our response addresses scope and schedule of future pipe inspections, examiner qualification and availability, primary system leak detection surveillance measures, compensatory actions if cracks are discovered, and results of IE Bulletin inspections not previously submitted.

The deadline for submitting a response to the generic letter was June 4, 1984. For some reason, we did not receive the generic letter until May 1, 1984, thus, 11 days had elapsed before we received the letter. The possibility of needing additional time to respond was discussed with the NRC Browns Ferry Project Manager on May 2, 1984.

If you have any questions concerning this information, please get in touch with us through the Browns Ferry Project Manager.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*  
L. M. Mills, Manager  
Nuclear Licensing

Subscribed and sworn to before  
me this 7th day of June 1984.

*Paulette H. White*  
Notary Public  
My Commission Expires 9-5-84

cc: See page 2

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Mr. Harold R. Denton

June 7, 1984

cc (Enclosure):

U.S. Nuclear Regulatory Commission  
Region II  
ATTN: James P. O'Reilly, Regional Administrator  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303

Mr. R. J. Clark  
Browns Ferry Project Manager  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Maryland 20814



ENCLOSURE  
RESPONSE TO GENERIC LETTER 84-11  
DATED APRIL 19, 1984  
BROWNS FERRY NUCLEAR PLANT

1. Scope and schedule of planned inspections.

Unit 1 Cycle 6 (Currently Scheduled for March 1985)

- . Piping replacement is scheduled.
- . Stainless steel welds greater than 4 inches\* which are not being replaced will be selected for examination in accordance with the guidance given in Generic Letter 84-11.

Unit 2 Cycle 5 (Currently Scheduled for August 1984)

- . One hundred-percent examination of the accessible stainless steel welds greater than 4 inches\* before Induction Heat Stress Improvement (IHSI).
- . Twenty-five percent sample of the stainless steel welds (greater than 4 inches) following IHSI. The sample will be selected from those welds which require recording/evaluation of indications. Any additional welds needed to complete the 25-percent sample will be from weld locations shown to have the highest propensity for cracking.

Unit 3 Cycle 5 (Currently in an Outage)

- . One hundred-percent examination of the accessible stainless steel welds greater than 4 inches\* before IHSI.
- . Twenty-five percent sample of the stainless steel welds (greater than 4 inches)\* following IHSI. The sample was selected from those welds which require recording/evaluation of indications (34 welds) and additional welds from locations shown to have the highest propensity for cracking (9 welds).

Unit 3 Cycle 6 (Currently Scheduled for December 1985)

- . The sample will be in accordance with Generic Letter 84-11 with the exception of 100-percent examination following IHSI. The post IHSI sample will be the 25-percent sample performed during unit 3 cycle 5.

2. Availability and qualification of examiner.

TVA presently has available 4 Level III examiners and 20 Level II examiners who are certified by either the IE Bulletin 83-02, Demonstrated Capability Process or the EPRI-NDE Center Training and Testing Process. In addition, numerous Level I examiners have been trained and certified by TVA, but they are predominantly contractor-supplied and their availability is unknown.

\*greater than or equal to 4 inches.





3. Description of any special surveillance measures for primary system leak detection beyond those required by current technical specifications.

Leak detection and leakage limits that will be used at Browns Ferry Nuclear Plant are those described in the technical specifications for units 1, 2, and 3. Leakage detection and limits follow the requirements of attachment 1 to Generic Letter 84-11 with the following exceptions.

- a. The containment air-monitor system has not been upgraded or calibrated to correspond to a particular leak rate. This is the system which promptly indicates an increase in leak rate.
  - b. Leakage rate is monitored at 8-hour intervals.
  - c. At least one sump leakage monitor must be operable or power operation is permissible only for the succeeding 72 hours.
4. Results of bulletin inspections not previously submitted to NRC.

There are no bulletin examination reports outstanding.

5. Remedial measures, if any, to be taken when cracks are discovered.

TVA intends to follow the recommended actions in attachment 2 with the following exceptions.

- a. Item 2(b)(i)--We believe that the first weld layer that clears dye-penetrant testing inspection should be counted as effective overlay thickness if it can be demonstrated that cracks will not grow during the proposed operating period to within one weld layer thickness of the pipe outside diameter surface.
- b. Item 2(b)(ii)--We believe that the above comment is applicable to Item 2(b)(ii). We also believe that less than two weld layers should be permitted if it can be demonstrated that the cracks are arrested by one weld layer and that the requirements of IWB-3640 are met.

