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50-296 Browns Ferry Nuclear Power Station, Unit 3, Tennessee 05000296
AUTH.NAME AUTHOR AFFILIATION
MILLS,L.M. Tennessee Valley Authority
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards status info re request for exemption from 10CFR50, App J covering instrument lines,Type B testing of containment airlocks & Type C testing of traversong in-core probe sys valves.

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TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

September 20, 1984

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

By previous correspondence between TVA and NRC, we have requested exemption from the requirements of 10 CFR Part 50 Appendix J for the Browns Ferry Nuclear Plant. There have been a series of recent telephone conferences between our staffs in which we have informed your staff regarding the status of Browns Ferry and which exemptions are still needed. Enclosed is the information which was provided verbally to your staff. It is our understanding that your staff is close to documenting resolution of this issue.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Licensing

Subscribed and sworn to before me this 20th day of Sept. 1984.

Paulette N. White
Notary Public
My Commission Expires 8-24-88

Enclosure
cc (Enclosure):
U.S. Nuclear Regulatory Commission
Region II
ATTN: James P. O'Reilly, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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

A006
1/1

ENCLOSURE

STATUS INFORMATION REGARDING
REQUEST FOR EXEMPTION FROM
10 CFR 50 APPENDIX J
BROWNS FERRY NUCLEAR PLANT

1. Instrument lines - Instrument systems (instrument lines and instruments) are considered to be extensions of the primary containment boundary and thus will be tested by exposure to the differential pressure during the Type A test. No exemption is required.

2. Draining and venting of the seal water supply of the reactor recirculation pumps during Type A testing - Modifications were made to allow draining and venting of the seal water supply to the reactor recirculation pumps during Type A and C testing. No exemption is required.

3. Type B testing of containment airlocks - Modifications have been made to facilitate testing of the personnel airlock doors at a pressure of Pa at six-month intervals. No exemption is required.

4. Test airlock doors at 2.5 psig after each opening - The containment airlocks are tested at 2.5 psig within 72 hours after each opening or every 72 hours during periods of frequent openings. This is reflected in BFN's technical specifications or revisions to the technical specification which have been requested to reflect this. It is also consistent with Appendix J. No exemption is required.

5. Reverse direction Type C testing of isolation valves FCV-1-55, FCV-71-2, and FCV-73-2 - This exemption is still requested.

6. Reduced pressure Type C testing of main steam isolation valves - Because of the unique design of the main steam isolation valves, they will continue to be tested at 25 psig by pressurizing between the valves. It is TVA's understanding that this is acceptable to NRC.

7. Type C testing of 59 valves with water in lieu of air or nitrogen as a medium - These 59 valves are Type C tested in accordance with Appendix J. No exemption is required.

8. Type C testing of the reactor building closed cooling water valves 70-74 and 70-506. This exemption is still requested.

9. Type C testing of traversing in-core probe (TIP) system valves - The TIP valves will be Type C tested in accordance with Appendix J. No exemption is required. The modification to the nitrogen supply to the trip indexers has not been made; however, the existing valves in that line will be Type C tested.

10. Summing the leakage from Type C tests - When Type C testing containment isolation valves, leakage paths are summed to verify that the total leakage is less than 0.60 La. The "as left" path leakage assumed to be the greater leak rate of the two valves in series. This is conservative and is in accordance with the requirements of Appendix J.