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HUFHAM,J.W. Tennessee Valley Authority
RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards request for extension on response to Confirmatory Order on NUREG-0737,TMI Action Items II.F.1.1 & II.F.1.2 by revising local readout capability to read "prior to Unit 2 startup in Cycle 6," Approval requested by 841231.

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

November 28, 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. 50-260
Tennessee Valley Authority	)	50-296

By letter from D. B. Vassallo to H. G. Parris dated March 25, 1983, TVA received Orders confirming commitments on post-TMI related issues (NUREG-0737) for the Browns Ferry Nuclear Plant units 1, 2, and 3. Those Orders required, in part, that monitoring capability for noble gas and iodine effluents with local readout be provided by December 31, 1984 for units 2 and 3. This effluent monitoring is required by NUREG-0737, items II.F.1.1 and II.F.1.2.

TVA hereby requests that the deadline for the II.F.1.1 and II.F.1.2 local readout capability, units 2 and 3, be revised to read "prior to unit 2 startup in cycle 6" instead of December 31, 1984. Every effort will be made to complete the modifications as early as possible in the current unit 2 outage. This schedule represents completion of this work one cycle earlier than previously committed (unit 1 cycle 6 was original commitment). Justification for this requested extension of Order is provided in the enclosure. Approval of this extension is requested by December 31, 1984.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. W. Hufham, Manager
Licensing and Regulations

Subscribed and sworn to before me this 28th day of Nov. 1984.

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

Enclosure
cc: See page 2

A046
1/1

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

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

ENCLOSURE
REQUEST FOR ORDER EXTENSION ON
NUREG-0737 ITEMS II.F.1.1 AND II.F.1.2
BROWNS FERRY NUCLEAR PLANT UNITS 2 AND 3

BACKGROUND

TVA received Confirmatory Orders for Browns Ferry Nuclear Plant units 1, 2, and 3 dated March 25, 1983 on the above subject items. Those Orders required the following:

> Install noble gas effluent monitors with local readout capability
> and
> Provide capability for effluent monitoring of iodine with local readout capability

by a deadline of December 31, 1984. That requirement was for units 2 and 3 only.

The Browns Ferry Integrated Schedule, submitted by TVA letter from L. M. Mills to H. R. Denton dated January 14, 1983, reflected completion of non-outage work on items II.F.1.1 and II.F.1.2 during unit 1 cycle 6 outage approximately December 1, 1984. Performance of required outage work was shown for the cycle 6 outage of each unit. Statements made later in a response to a request for additional information regarding items II.F.1.1 and II.F.1.2 were consistent with the submitted integrated schedule. That response was submitted by TVA letter from L. M. Mills to H. R. Denton dated February 28, 1983 and stated in part:

> The monitoring equipment presently intended to be purchased has local readout capability and would be functional except for control room instrumentation upon completion of the nonoutage work. Therefore, the monitoring equipment which is common to all three units as shown on the January 14, 1983 schedule would be operable with local readout and have instrumentation installed in the unit 1 control room during the unit 1 cycle 6 refueling outage. Items II.F.1.1 and II.F.1.2 will be completely operable by the end of the unit 1 cycle 6 outage with only the units 2 and 3 control room instrumentations scheduled for installation during their respective cycle 6 outages.

Based on the January 14, 1983 schedule and the February 28, 1983 response, NRC issued the March 25, 1983 Confirmatory Order documenting that the work related to local monitoring capability for II.F.1.1 and II.F.1.2 would be completed by December 31, 1984. At that time this was consistent with TVA's best schedular projection.

Since that time, there have been major changes to the schedule, causing extended outages and thereby delaying the following outages. These extended outages were primarily caused by the discovery of extensive cracking in stainless steel piping of unit 1 during the cycle 5 outage and the extended unit 3 cycle 5 outage. One of the major changes was a shift in the unit 1 cycle 6 outage start from September 1984 (reference integrated schedule submitted January 14, 1983) to February 1985 (reference schedule submitted July 18, 1983). Any work, including non-outage work, scheduled to start during the unit 1 cycle 6 outage, would likewise be shifted.

COMPENSATORY MEASURES

Browns Ferry currently has a system that can detect and measure noble gas releases out the stack during and following an accident (II.F.1.1). These monitors do not meet the NUREG-0737 upper range requirements set forth in NUREG-0737. The interim sample system can monitor radioiodine and particulates as required in II.F.1.2. TVA believes that the interim monitoring systems are satisfactory for the interim period until the new monitors are installed and that the modifications constitute no significant safety concerns.