

March 28, 1985

Docket Nos. 50-259/260/296

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Mr. Hugh G. Parris
Manager of Power
Tennessee Valley Authority
500A Chestnut Street, Tower II
Chattanooga, Tennessee 37401

Dear Mr. Parris:

**SUBJECT: ENVIRONMENTAL QUALIFICATION OF ELECTRIC EQUIPMENT
IMPORTANT TO SAFETY - EXTENSION OF DEADLINE**

Re: Browns Ferry Nuclear Plant, Units 1, 2 and 3

This letter responds to your submittal dated January 11, 1985, as supplemented on February 26, 1985, March 15 and March 27, 1985, in which you requested an extension of the deadline for final environmental qualification of electrical equipment within the scope of 10 CFR 50.49.

Section 50.49(g) of 10 CFR Part 50 requires that each holder of an operating license issued prior to February 22, 1983, shall by May 20, 1983, identify the electrical equipment important to safety within the scope of this section already qualified and submit a schedule for either the qualification to the provisions of this section or for the replacement of the remaining electrical equipment important to safety within the scope of this section. This schedule must establish a goal of final environmental qualification of the electrical equipment within the scope of this section by the end of the second refueling outage after March 31, 1982, or by March 31, 1985, whichever is earlier. The rule also provides that the Director of the Office of Nuclear Reactor Regulation may grant requests for extensions of this deadline to a date no later than November 30, 1985, for specific pieces of equipment if these requests are filed on a timely basis and demonstrate good cause for such an extension, such as procurement lead time, test complications and installation problems. In addition, 10 CFR 50.49(h) provides that each licensee shall notify the Commission of any significant equipment problem that may require extension of the completion date provided in paragraph (g) of this section within sixty days of its discovery.

In compliance with 10 CFR 50.49(g), by letter dated May 20, 1983, the Tennessee Valley Authority (TVA) identified electrical equipment important to safety already qualified and submitted a schedule for either the qualification or for the replacement of the remaining electrical equipment important to safety within the scope of this section. The schedule established a goal of final environmental qualification by the end of the

CONTACT:
R. Clark
492-7162

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second refueling outage after March 31, 1982 for Browns Ferry Unit 2 and by March 31, 1985 for Browns Ferry Units 1 and 3, since the latter date is earlier than the second refueling outage after March 31, 1982.

On May 24, 1984, your representatives met with the NRC staff to discuss resolution of staff comments on the environmental qualification program for Browns Ferry, Units 1, 2 and 3. In this meeting, your representatives confirmed that TVA was experiencing problems in procuring replacement equipment for some specific items and experiencing delays in the qualification test programs.

On January 11, 1985, TVA filed a timely request for an extension to the schedular requirements of 10 CFR 50.49(g) for Browns Ferry, Units 1, 2 and 3 to complete the environmental qualifications of certain equipment that cannot be completed by March 31, 1985. The requested extension was until November 30, 1985 for all three units.

Browns Ferry Unit 1 is currently in cold shutdown as a result of maintenance problems. By letter dated March 27, 1985, TVA informed us that they had decided to keep Unit 1 in shutdown until all environmental qualification work required by 10 CFR 50.49 is completed. This letter also withdrew TVA's extension request of February 26, 1985 to operate Unit 1 until July 12, 1985.

Browns Ferry Unit 2 shut down for refueling and modifications on September 15, 1984. In your letter of January 11, 1985 and reconfirmed in the March 15, 1985 submittal, TVA stated that it plans to qualify all components presently identified as needing qualification before Unit 2 startup. Completion of these modifications has extended the projected startup date to at least September 1985. In TVA's March 15, 1985 letter, and reconfirmed in the March 27, 1985 letter, it stated that, since Unit 2 is shut down and will be shut down on March 31, 1985 and since TVA plans to qualify all equipment prior to startup in Cycle 6, no extension to the schedular requirements of 10 CFR 50.49(g) is needed. The March 27, 1985 letter stated that TVA has committed to complete all environmental qualification work on Unit 2 prior to returning the unit to service even if this results in an extension beyond the scheduled return to service date of September 3, 1985.

Browns Ferry Unit 3 started up in Cycle 6 on November 19, 1984 and could operate until at least April 30, 1986. However, TVA has committed to shut down Unit 3 on November 30, 1985 - part way through the fuel cycle - and to complete all remaining qualification work before restarting Unit 3 for the remainder of Cycle 6. TVA stated that the extension from March 31, 1985 to November 30, 1985 is needed to permit operation of Browns Ferry Unit 3 during this period. During the requested extension period, both Units 1 and 2 will be simultaneously shut down during the peak summer load period. For Browns Ferry Unit 3, TVA submitted 83 JCOs, covering 231 items of equipment. The

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items were solenoid valves, pressure switches, transmitters, controllers, temperature elements, level switches, valve operators, motors, power supplies and motor control centers. TVA provided a status for each item of equipment.

For each Browns Ferry unit, there are approximately 1475 items or devices which must be qualified. For a majority of the items, the replacement equipment is onsite and is being installed in Unit 2. For all three units, 18 items are still in various phases of testing and 41 items are still in procurement. For the latter, delivery is projected from now through August 1, 1985. A large number of devices are environmentally unqualified due only to a generic design problem TVA recently discovered with conduit seals. In a submittal dated December 10, 1984, TVA informed us of a potential problem discovered at Watts Bar which also affected the Sequoyah and Browns Ferry nuclear plants. The problem concerned possible adverse moisture intrusion into equipment via the conduit. The corrective action is to install conduit seals which can only be done during a unit outage. The December 10, 1984 submittal listed 132 items of equipment that were being changed to "unqualified status" at that time due solely to the conduit seal problem and provided JCOs for each class of equipment. These JCOs were also included in the January 11 and March 15, 1985 submittals. For a significant number of items, the equipment had passed qualification tests but was still in the unqualified status until the documentation and test reports were reviewed and approved by the various TVA organizational groups involved (i.e., design, engineering, operations, quality assurance, etc.). Other significant causes for equipment being unqualified were that replacement devices have not been delivered; testing has not been completed or engineering/design evaluations and work plans have not been completed.

You have provided justifications for continued operation for all items of unqualified equipment during the requested extension period for Browns Ferry Unit 3. We have reviewed the JCOs and find they are sufficient to support operation during the requested extension period.

We have reviewed the submittals described above and conclude that the request for extension for Unit 3 is within the scope of 10 CFR 50.49(g) and that TVA has shown good cause for the extension stemming from the difficulties encountered in obtaining qualified replacement parts, the long durations required for some testing, and meeting the requirements of conflicting scheduling problems. We find that extending the implementation date until November 30, 1985 for Browns Ferry Unit 3 is acceptable and that operation until that time will not adversely affect the public health and safety. However, the staff would oppose any request for further extension of time you may seek from the Commission.

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5. The fifth part of the document discusses the defenses to a contract, which include lack of capacity, duress, and unconscionability.

Mr. Hugh G. Parris

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Your request for extension of the deadline for Browns Ferry Unit 3 is hereby granted.

Sincerely,

Original signed by
Darrell G. Eisenhut

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: See next page

*Please see previous concurrence page.

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RClark*
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WLong*
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DVassallo*
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Mr. Hugh G. Parris
Tennessee Valley Authority
Browns Ferry Nuclear Plant, Units 1, 2 and 3

cc:

H. S. Sanger, Jr., Esquire
General Counsel
Tennessee Valley Authority
400 Commerce Avenue
E 11B 330
Knoxville, Tennessee 37902

James A. Coffey
Site Director, BFNP
Tennessee Valley Authority
Post Office Box 2000
Decatur, Alabama 35602

Mr. Ron Rogers
Tennessee Valley Authority
400 Chestnut Street, Tower II
Chattanooga, Tennessee 37401

Resident Inspector
U. S. Nuclear Regulatory Commission
Route 2, Box 311
Athens, Alabama 35611

Mr. Charles R. Christopher
Chairman, Limestone County Commission
Post Office Box 188
Athens, Alabama 35611

Mr. Donald L. Williams, Jr.
Tennessee Valley Authority
400 West Summit Hill Drive, W10B85
Knoxville, Tennessee 37902

Ira L. Meyers, M.D.
State Health Officer
State Department of Public Health
State Office Building
Montgomery, Alabama 36130

George Jones, Manager, BFNP
Tennessee Valley Authority
Post Office Box 2000
Decatur, Alabama 35602

Mr. H. N. Culver
249A HBD
400 Commerce Avenue
Tennessee Valley Authority
Knoxville, Tennessee 37902

Mr. Oliver Havens
U. S. Nuclear Regulatory Commission
Reactor Training Center
Osborne Office Center, Suite 200
Chattanooga, Tennessee 37411

James P. O'Reilly
Regional Administrator
Region II Office
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

