NOV 18 1986

Dockets Nos.: 50-259
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Manager of Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Sir:

SUBJECT: NUREG-0737, ITEM II.F.2, INADEQUATE CORE COOLING INSTRUMENTATION (GENERIC LETTER 84-23); MPA-F-26

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

On October 26, 1984, the NRC staff sent Generic Letter No. 84-23 (Reactor Vessel Water Level Instrumentation in BWRs) to all Boiling Water Reactor licensees. On February 12, 1985 we retransmitted the above referenced Generic Letter and requested a response within 30 days. This Generic Letter outlined the importance of reactor vessel water level instrumentation in BWRs. The staff concluded that permanent physical improvements should be made on a deliberate schedule to reduce the burden on the operator. Two improvement categories were proposed that, if implemented, would result in increased assurance that the level instrumentation will provide the core cooling instrumentation required by NUREG-0737, Item II.F.2. Licensees were asked to submit descriptions of plans to implement these improvements and a proposed schedule.

By letter dated April 8, 1985, July 15, 1985, October 15, 1985, and March 12, 1986, you responded to Generic Letter 84-23 and indicated that the reactor vessel water level instrumentation would be modified to improve accuracy and reliability under transient and accident conditions and decrease the need for operator diagnosis. The specified modifications addressed in the above submittals would address the issue of indication errors caused by high drywell temperature and are, therefore, acceptable.

In the above referenced April 8, 1985 letter, you also addressed the second improvement category: replacement of mechanical level indication equipment with analog level transmitters. Your letter indicated that level instruments which initiate Reactor Protection and Emergency Core Cooling systems and provide class 1E level indication will be converted to analog trip units. We find that your proposed technical solution at the Browns Ferry facility adequately addresses the second improvement category and, therefore, we find the proposed modifications are acceptable.

In the above referenced letters, you proposed implementation dates for the proposed modifications. The completion dates for modifications to minimize the effects of high drywell temperature on level indications were proposed for the Cycle 7 refueling outages for all three units. Prior problems with discrepancies involving the measurement of reactor water level at Browns Ferry lead the staff to conclude that further discussions on the proposed implementation dates are required. We request that your staff be prepared to discuss expedited implementation dates as part of the January restart/licensing meeting.

Sincerely,

Original signed by
Daniel R. Muller

Daniel R. Muller, Director
BWR Project Directorate #2
Division of BWR Licensing

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Manager, Office of Nuclear Power
Tennessee Valley Authority

Browns Ferry Nuclear Plant
Units 1, 2, and 3

cc:
General Counsel
Tennessee Valley Authority
400 Commerce Avenue
E 11B 330
Knoxville, Tennessee 37902

Director, Nuclear Engineering
Tennessee Valley Authority
400 West Summit Hill Dirve, W12 A12
Knoxville, Tennessee 37902

R. L. Gridley
Tennessee Valley Authority
5N 157B Lookout Place
Chattanooga, Tennessee 37402-2801

M. J. May
Tennessee Valley Authority
Browns Ferry Nuclear Plant
Post Office Box 2000
Decatur, Alabama 35602

H. P. Pomrehn
Tennessee Valley Authority
Browns Ferry Nuclear Plant
Post Office Box 2000
Decatur, Alabama 35602

Chairman, Limestone County Commission
Post Office Box 188
Athens, Alabama 35611

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

Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, Suite 2900
Atlanta, Georgia 30303

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

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