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SUBJECT: Responds to 861027 ltr suggesting that util develop integrated surveillance program for all three units that is more related to fluence than to predetermined exposure. Util will reconsider need for program based after surveillance.

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MAY 15 1987

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

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

BROWNS FERRY NUCLEAR PLANT (BFN) - REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM - UNITS 1, 2, AND 3

The Browns Ferry Nuclear Plant Technical Specifications for all three units presently specify that the reactor vessel beltline material surveillance capsules be withdrawn from each reactor at one-fourth service life and three-fourths service life. In a letter from J. A. Domer to D. B. Vassallo dated July 23, 1985, TVA provided an interpretation of one-fourth service life as being equivalent to 8.0 effective full-power years (EFPY) and, similarly, three-fourths service life as being equivalent to 24.0 EFPY. In a letter from R. J. Clark (NRC) to S. A. White (TVA) dated October 27, 1986, NRC suggested that TVA develop an integrated surveillance program for all three BFN units that is more related to estimated fluence than to a predetermined exposure interval (e.g., 24 EFPY).

At this time, TVA believes that development of an integrated surveillance program related to fluence rather than to a set time would be premature. If developed now, such a program would be based on extrapolations of the limited dosimetry measurements which were taken for unit 1 during the first fuel cycle. Since dosimetry measurements for 8 EFPY would be more credible than cycle 1 dosimetry data, TVA prefers to consider the development of a revised program based on the testing and analysis results from an 8 EFPY capsule. Therefore, we propose to withdraw the first set of surveillance specimens from each reactor vessel at the end of each unit's cycle which most closely approximates 8.0 EFPY of operation. This is a valid method for meeting the current BFN technical specification requirement of one-fourth service life.

Based on the results of the first set of surveillance specimens, TVA will reconsider the need to develop an integrated surveillance program and the proposal to base the surveillance program on estimated neutron fluence. 10 CFR 50, Appendix H, Section III requires a report of the test results from

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the first set of BFN surveillance specimens. TVA will address in that report any proposed changes to the surveillance program as a result of evaluating those test results.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley, Director
Nuclear Safety and Licensing

cc: Mr. G. G. Zech, Assistant Director
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