

November 27, 1987

Docket No. 50-260

DISTRIBUTION

Docket File

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Dear Mr. White:

SUBJECT: REVIEW OF SECTION IV (SUMMARY OF BROWNS FERRY NUCLEAR PLANT COMMITMENTS) OF VOLUME 3, REVISION 1 (TAC 62266, 62268)

Re: Browns Ferry Nuclear Plant, Unit 2

Section IV (Summary of Browns Ferry Nuclear Plant Commitments) includes committed NRC regulatory modifications and their proposed schedules. Items in Section IV include, among other things, backlogged regulatory commitments plus new NRC required commitments. The staff in its initial review of Section IV has determined that the regulatory requirements identified as NUREG-0737, II.F.2 and NUREG-0737, II.K.3.18 must be completed prior to the restart of Unit 2. The staff is preparing additional directives to TVA on the following NUREG-0737 items; I.D.1 (Detailed Control Room Design Review) and I.C.1 (Upgrade Emergency Operating Procedures).

A copy of the staff's evaluation is enclosed. We expect those NUREG-0737 items listed above are to be completed prior to Unit 2 restart.

Sincerely,

Original signed by:

Gary G. Zech, Assistant Director  
for Projects  
TVA Projects Division  
Office of Special Projects

Enclosure:  
As stated

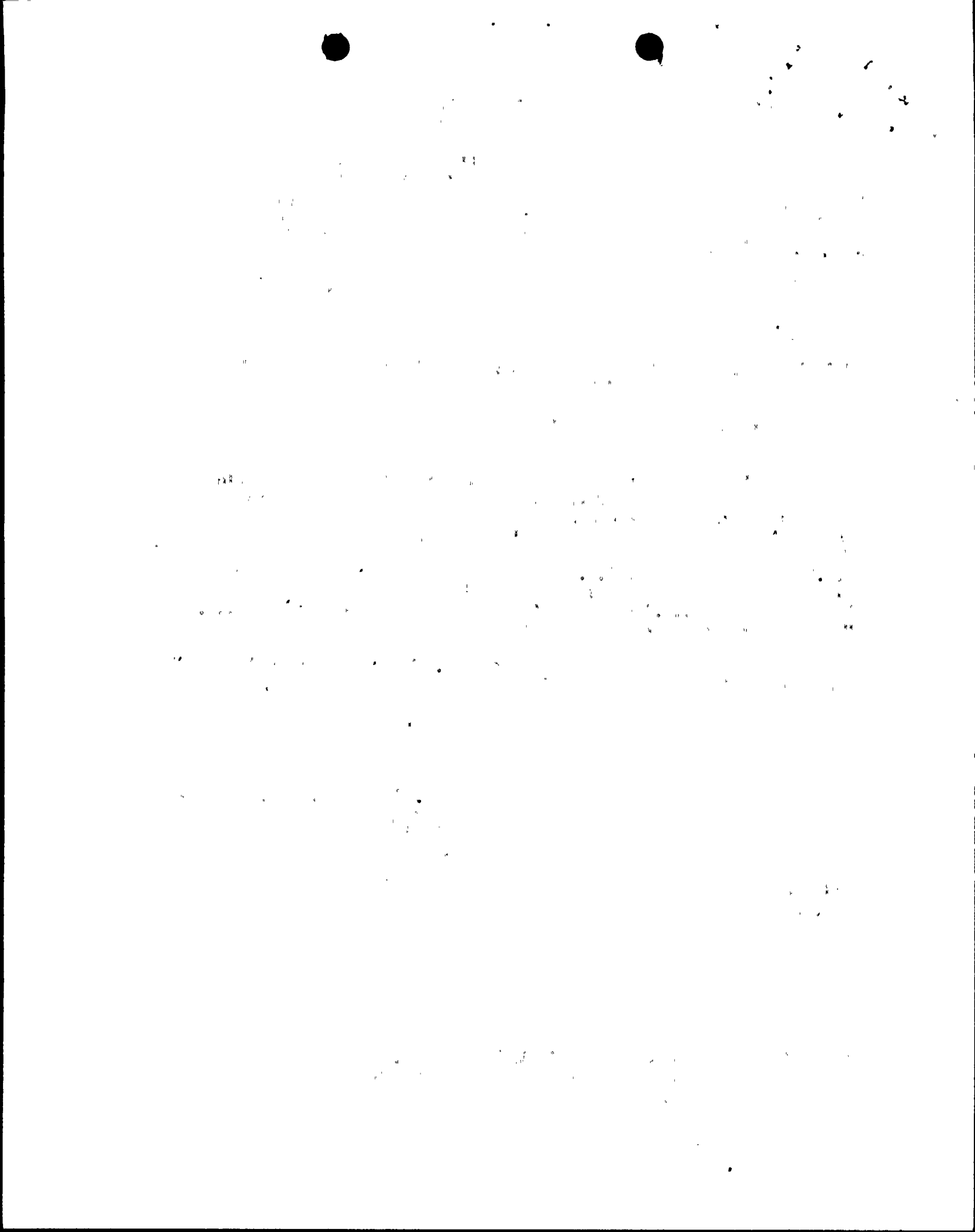
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Mr. S. A. White  
Tennessee Valley Authority

Browns Ferry Nuclear Plant  
Units 1, 2, and 3

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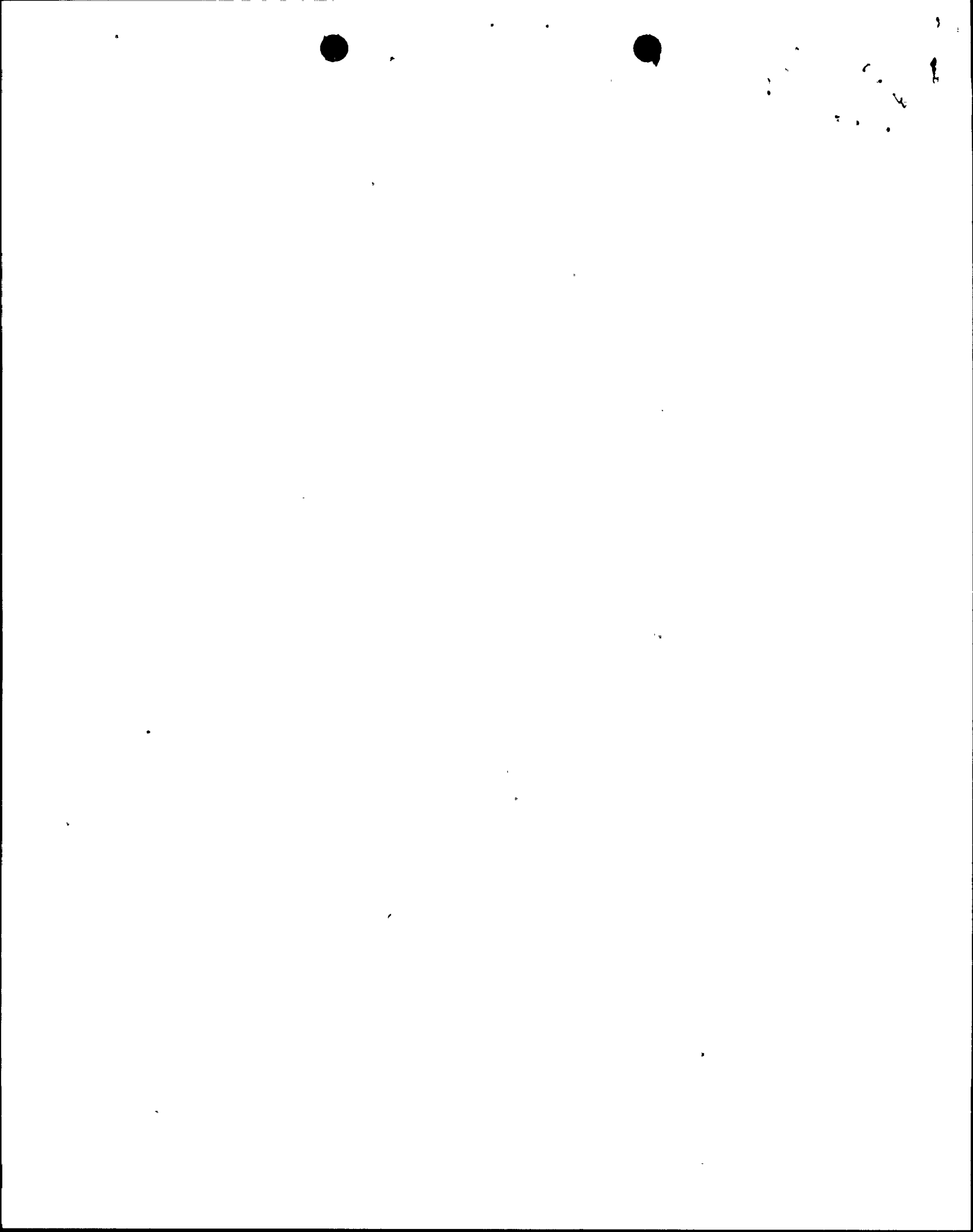
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

EVALUATION BY THE OFFICE OF SPECIAL PROJECTS  
RELATING TO SECTION IV (SUMMARY OF BROWNS FERRY NUCLEAR PLANT COMMITMENTS)  
OF VOLUME 3, REVISION 1 TO THE BROWNS FERRY NUCLEAR PERFORMANCE PLAN  
TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT, UNIT 2  
DOCKET NO. 50-260

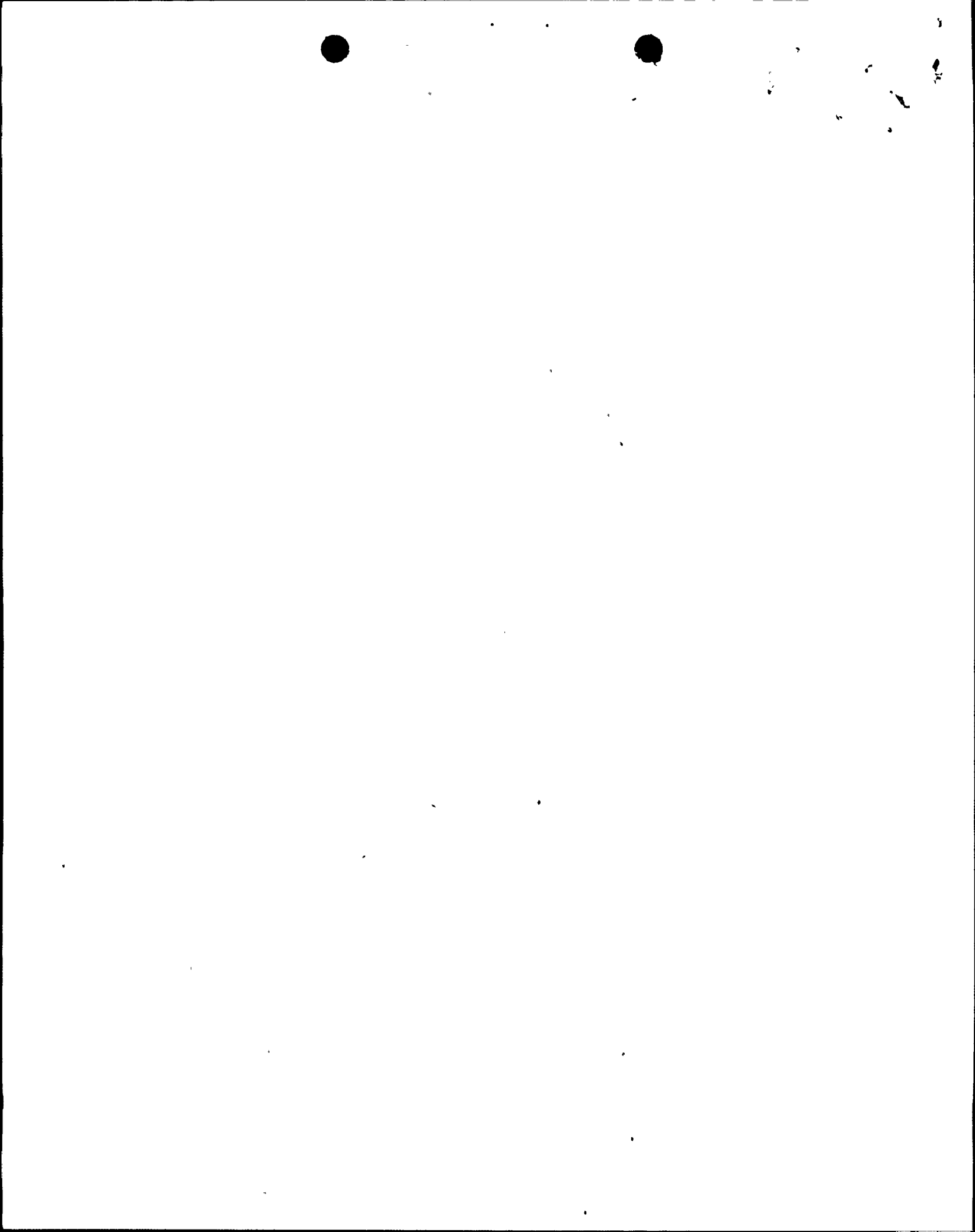
1.0 INTRODUCTION

On September 17, 1985, in a letter from NRC to the Tennessee Valley Authority (TVA), the NRC staff requested specific information pursuant to 10 CFR 50.54(f). In its response to this letter, TVA provided a Browns Ferry Nuclear Performance Plan, (Volume 3) outlining the measures which TVA is taking to improve its nuclear program for Browns Ferry. On July 1, 1987, TVA revised its Nuclear Performance Plan (NPP) for Browns Ferry. Section IV of the revised Browns Ferry NPP provides a summary of the Browns Ferry Nuclear Plant commitments lists. The commitments generally involve activities that (1) must be completed prior to restart, (2) must be completed to close out a long-term program, or (3) must be maintained as an ongoing program. The purpose of this evaluation is to review the proposed schedule of selected NRC required modifications and determine the adequacy of these schedules as they relate to the overall restart effort for Browns Ferry.

2.0 EVALUATION

The staff does not concur with TVA's proposal for deferral until after restart of Unit 2 for the following items:

- o NUREG-0737, II.F.2 (Generic Letter 84-23) Reactor Water Level Instrumentation in BWRs - NRC has approved the proposed modifications pertaining to II.F.2 in its letter dated November 18, 1986. However, the staff at that time indicated that it was seeking additional information concerning the proposed implementation dates. Due to prior problems with discrepancies involving the measurement of reactor water level at Browns Ferry, most recently at Unit 3 (3/9/85) forcing its shutdown, the staff finds that the rationale for delayed implementation provided in Volume 3, Revision 1 and supplemented by letter dated September 25, 1987 is not sufficient. We conclude that the proposed modification should be implemented prior to Unit 2 restart.



NUREG-0737, II.K.3.18 ADS Logic Modifications - We are concerned with the overall reliability of the ADS system. There is evidence to indicate that core melt damage at Browns Ferry is more likely to be induced by means of scram failure events than events such as station blackout (letter from S. D. Ebnetter to S. A. White, October 1, 1987). Therefore, we believe it is prudent to expedite those modifications which enhance system reliability following such transients--namely, NUREG-0737, II.K.3.18.

### 3.0 CONCLUSION

The staff concludes that TVA's proposed deferral until after restart of Unit 2 of NUREG-0737, Items II.F.2 and II.K.3.18 is not acceptable. Both items promise improvements to systems or features previously identified by the staff as requiring safety enhancements.

Principal Contributor: G. Gears

Dated: November 27, 1987

