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

Gentlemen:

In the Matter of Tennessee Valley Authority

Docket Nos. 50-260

BROWNS FERRY NUCLEAR PLANT (BFN) - SEISMIC QUALIFICATION OF MISCELLANEOUS STEEL

This letter describes the BFN program for the seismic qualification of miscellaneous steel. This letter supplements the information provided by section III.3.9 of revision 1 to the Browns Ferry Nuclear Performance Plan that was transmitted by S. A. White's letter dated July 1, 1987.

Enclosure 1 to this letter describes the BFN program for resolving this issue. Enclosure 2 to this letter is the interim operability criteria for miscellaneous steel. TVA requests your review of this program and the issuance of a written statement documenting the programs acceptability.

Please refer any questions regarding this submittal to M. J. May, Manager, BFN Site Licensing, (205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley, Director/ Nuclear Licensing and Regulatory Affairs

Enclosures cc: See page 2

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cc (Enclosures): Mr. K. P. Barr, Acting Assistant Director for Inspection Programs TVA Projects Division U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

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Browns Ferry Resident Inspector Browns Ferry Nuclear Plant Route 12, P.O. Box 637 Athens, Alabama 35611

ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY BROWNS FERRY NUCLEAR PLANT UNIT 2 MISCELLANEOUS STEEL

This report gives TVA's plan to demonstrate the adequacy of miscellaneous steel.

Issue

A corrective action report identified discrepancies between the as-constructed condition and design drawings for miscellaneous steel framing that was used for supporting pipes. Additionally, there was not adequate assurance that the miscellaneous steel framing was analyzed to confirm structural adequacy.

Background

Miscellaneous steel was installed based on typical framing details which were intended primarily for engineered and field-routed piping supports although HVAC, conduit, and cable tray supports may have been attached. This typical framing is not part of the plant's main structural support framing or structural features such as stairways or equipment access platforms.

Corrective Action Report 85-059 identified weld and steel details that were not on drawings. Investigation of this CAR identified generic deficiencies that included installation of miscellaneous steel without documentation on drawings, modifications to steel without drawing update, load changes, or additions that were not evaluated and no engineering documentation for miscellaneous steel framing details.

<u>Resolution</u>

To address the concerns regarding miscellaneous steel framing, an evaluation program was initiated to review miscellaneous steel consistent with the IE Bulletin 79–14 and torus piping programs. The present scope of this program includes approximately 350 miscellaneous steel frames.

For each of the frames that are being evaluated, a walkdown for attachments will be performed. Using loads from the appropriate program, the miscellaneous steel structures will be qualified to design criteria requirements and modifications will be prioritized based on an interim operability criteria similar to that used for large bore pipe supports. Miscellaneous steel which does not meet the design criteria, but is within the interim operability criteria, will be modified to meet the design criteria before restart from the next refueling outage. The miscellaneous steel which does not meet the interim operability criteria will be modified to meet the design criteria unless specifically requested and approved by NRC on a case by case basis before restart. A comparison of operability and design criteria is given in table 1.

The Long-Term Torus Integrity Program has been completed. The framing which supports the piping analyzed under the torus program has 75 supports and is being evaluated to determine its as-constructed acceptability.

Any modifications to the torus framing will be evaluated for generic implications to the entire scope of miscellaneous steel framing.

The FSAR commits that systems supported by miscellaneous steel remain functional under seismic loadings. The design criteria for miscellaneous steel are consistent with the requirements of the FSAR.

Licensing Issues

Issue:

The schedule for the evaluation of the miscellaneous steel will be consistent with the ongoing IE Bulletin 79-14 program. Modifications will be prioritized based on an interim operability criteria.

Justification:

The use of the operability criteria to prioritize modifications is acceptable, since the structural adequacy and system function will be maintained. The piping analyzed under the torus program provides a critical case evaluation, since the loads changed significantly due to the Mark I hydrodynamic loads. Modifications resulting from the walkdown and structural adequacy reviews will be evaluated for generic implications.

The miscellaneous steel qualification program is comprehensive and assures that the steel framing is acceptable. Modifications required to meet design criteria will be implemented before start up after the next refueling outage.

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TABLE 1 . BROWNS FERRY UNIT 2 MISC. STEEL CRITERIA COMPARISON CHART

ADDRESSES	DESIGN <u>CRITERIA</u>	OPERABILITY CRITERIA	REMARKS
ALLOWABLE STRES TENSION & BENDING	0.9F _Y	SMALLER OF 1.2F _Y OR 0.7F _U	SIMILAR TO PIPE SUPPORT OPER- ABILITY CRITERIA
ALLOWABLE STRESS COMPRESSION, AXIAL & BENDING	0.9F _Y	0.9F _{cR}	SIMILAR TO PIPE SUPPORT OPERABILITY CRITERIA
ALLOWABLE STRESS SHEAR	0.4Fr	SMALLER OF 0.72F _Y OR 0.42Fu	SIMILAR TO PIPE SUPPORT OPERABILITY CRITERIA
ALLOWABLE BOLT STRESS (TENSION)	F _Y	GREATER OF 0.7Fu OR Fy OF BOLT	SIMILAR TO PIPE SUPPORT OPERABILITY CRITERIA
ALLOWABLE CONCRETE EXPANSION ANCHORS FACTOR OF SAFETY WEDGE AND SHELL TYPE	WEDGE TYPE 4 SHELL TYPE 5 FOR TENSION 4 FOR SHEAR	ALL TYPES 2	SIMILAR TO PIPE SUPPORT OPERABILITY CRITERIA

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