



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

JUL 27 1988

Docket Nos: 50-259/50-260/50-296

Mr. S. A. White
Senior Vice President, Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Mr. White:

SUBJECT: FUEL LOAD ISSUES AND POWER ASCENSION TESTING FOR BROWNS FERRY
(BFN) UNIT 2

The TVA briefing on July 7, 1988 concerning the above subject provided a constructive exchange of issues and concerns held by TVA and the NRC staff. The TVA has documented by letter dated July 6, 1988 and its attachments the prerequisites for fuel loading. The purpose of this letter is to emphasize the NRC staff position that Browns Ferry Unit 2 fuel load be accomplished with required systems and components operable as defined by Technical Specifications and to provide you with our comments and questions based on the briefing and our review of the July 6, 1988 letter.

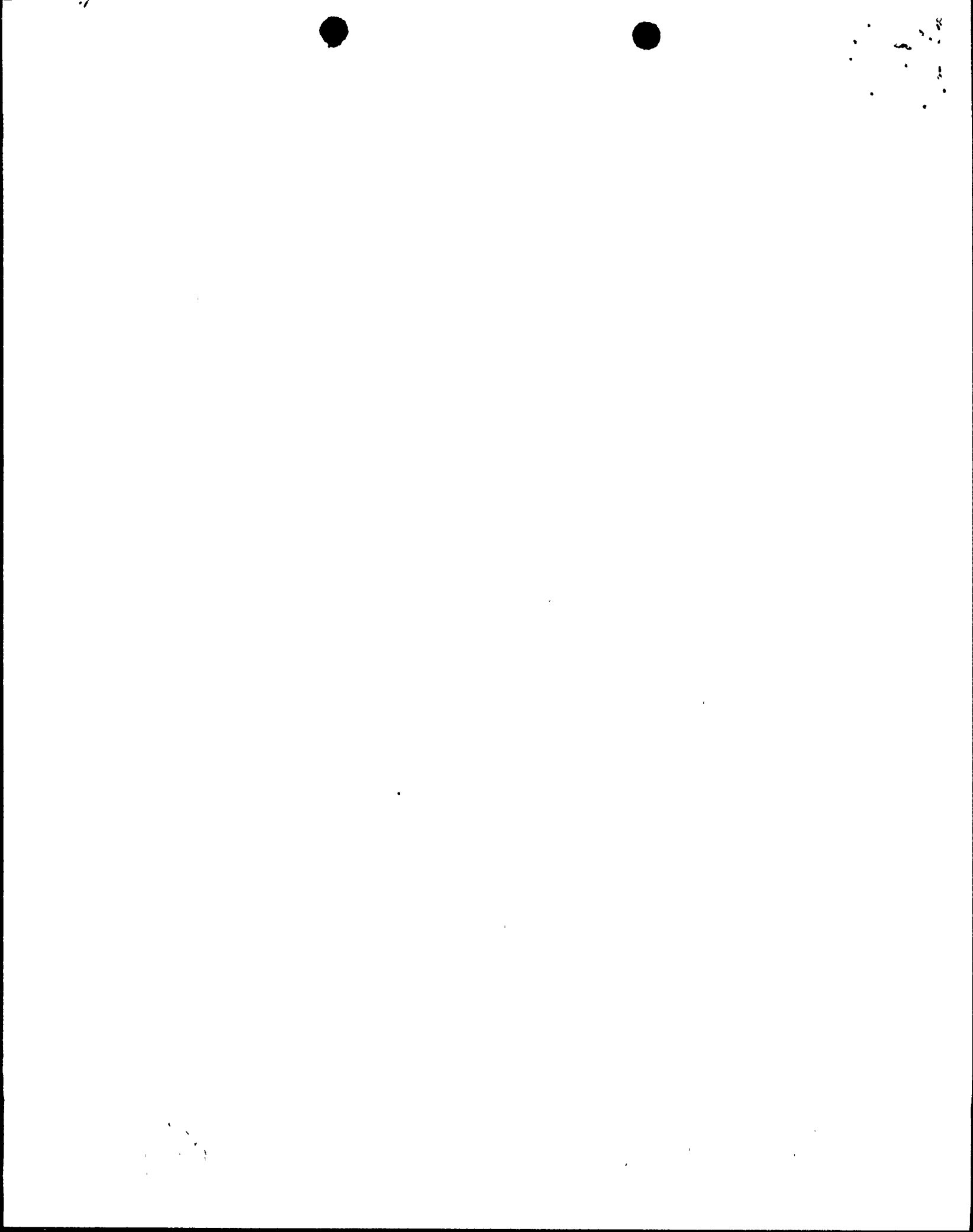
We understand that prior to fuel load the discovery phase for most of the Nuclear Performance Plan, Vol. III, Special Programs will be 100% complete for systems required for fuel load. For those programs where discovery is not complete, we request that, prior to fuel load, you describe in a submittal to the NRC the justification for your confidence that operability is not likely to be impaired by undiscovered deficiencies. We consider this to be most significant for programs associated with seismic and electrical issues.

To support your September 1, 1988 refuel date, you have scheduled approximately 30 systems to be returned to service over a period of 27 days prior to fuel reload. Ten of these systems are scheduled to be returned to service during the two days prior to reload. We are concerned that your schedule does not provide a "quiet time" to allow your operations staff time to get used to maintaining the systems in an operable status prior to going into the refuel mode, and does not provide sufficient time for NRC to develop adequate assurance that the systems needed for refuel are operable and can be operated in accordance with the Technical Specifications. We believe that your schedule needs to be adjusted to provide time for these activities.

The staff has the following comments on TVA's July 6, 1988 letter and procedures SDSP-12.4, "Return to Service and Closure of Modifications," and SDSP-12.7, "System Pre-Operability Checklist":

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- a. Prior to fuel load, TVA should provide to the resident inspection staff all operability item deferral forms associated with BFN, Unit 2 return to service, that are generated to justify operability of systems required for fuel load. For those systems or components which do not meet the Technical Specification requirements for operability, you should be prepared to submit sufficient justification to the staff. The staff considers that a period of six weeks will be required to assure proper review and processing of any required licensing actions.
- b. We expect each system required for fuel load to have a completed system preoperability checklist (defined by SDSP-12.7, Rev. 2) prior to system return to service. If this is not true, please notify us immediately.
- c. SDSP-12.7, Section 6.1.1, Page 3. The minimum number of systems to support the restart milestones should be those required to be operable by the Technical Specifications, and this should be clearly stated in this section.
- d. SDSP-12.7, Section 6.3. Guidance should be given or referenced on how to determine which items identified as required for systems operability may be deferred.
- e. SDSP-12.7. In Section 6.4.4 and other sections "Special Operating Conditions" is mentioned. This is not defined in the procedure. We question how they are determined and their significance. We believe this needs to be better described in the procedure.
- f. SDSP-12.7, Section 9.0. The Operability Item Deferral Form is an important record and should be retained for the same period of time as the SPOCs, a minimum of two years after restart.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Steven D. Richardson
Steven D. Richardson, Director
TVA Projects Division
Office of Special Projects

cc: See next page

Tennessee Valley Authority

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Mr. S. A. White
Tennessee Valley Authority

Browns Ferry Nuclear Plant
Units 1, 2, and 3

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Claude Earl Fox, M.D.
State Health Officer
State Department of Public Health
State Office Building
Montgomery, Alabama 36130

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Original signed by

Steven D. Richardson, Director
 TVA Projects Division
 Office of Special Projects

cc: See next page

OSP:TVA/LA
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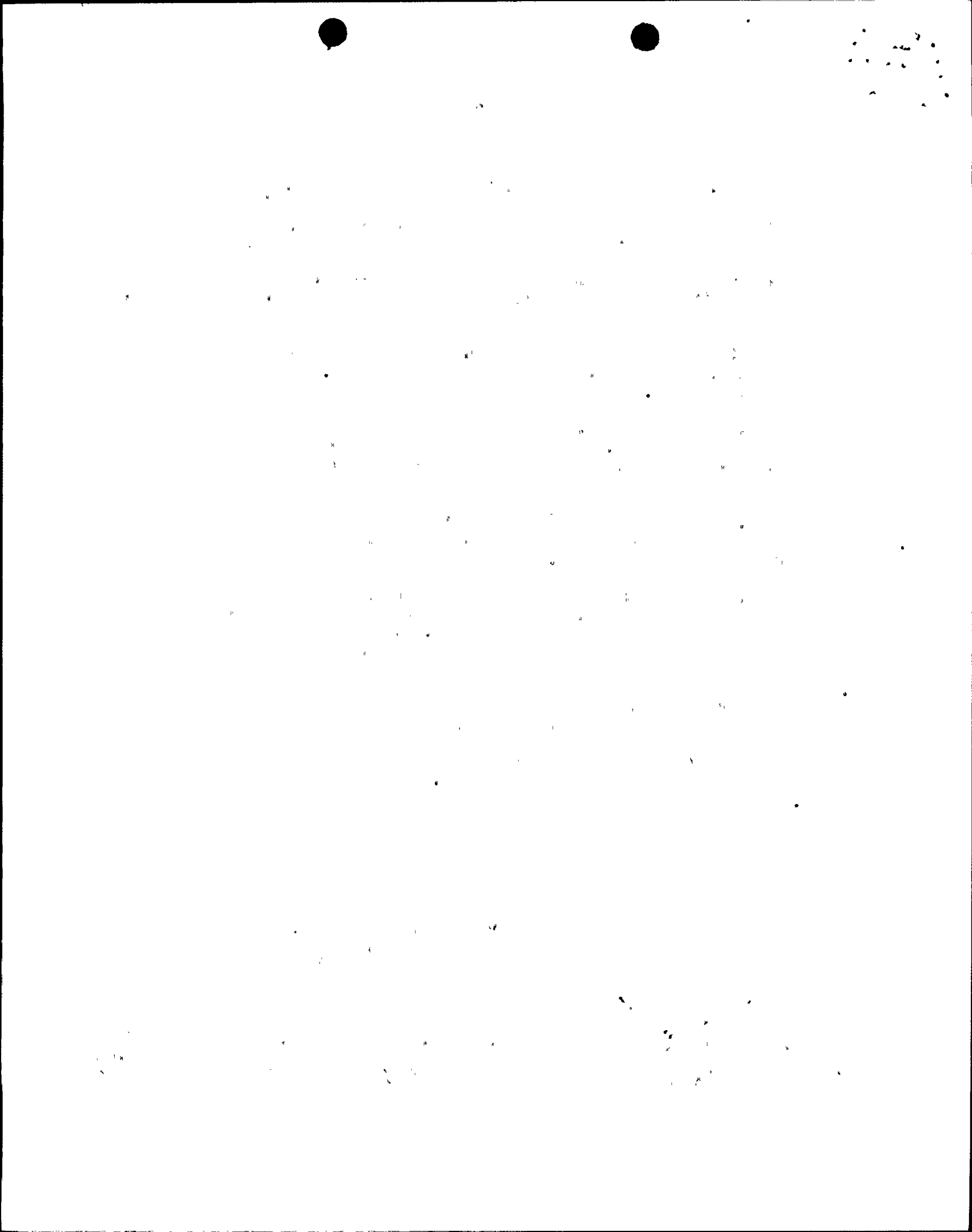
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Tennessee Valley Authority

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