



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

DEC 30 1988

Docket No. 50-260

Mr. Oliver D. Kingsley, Jr.
Senior Vice President, Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

Dear Mr. Kingsley:

SUBJECT: FUEL LOAD ISSUES FOR BROWNS FERRY (BFN) UNIT 2

The Tennessee Valley Authority (TVA) has documented by letter dated October 21, 1988 and its enclosures, the prerequisites for reloading fuel in BFN Unit 2. The purpose of this letter is to provide our comments and questions based on our review of the October 21, 1988 letter and previous meetings on this subject.

It is our understanding that, in determining that a system is operable and ready for return to service for fuel load, the evaluation will be based on FSAR and Technical Specification requirements. The fact that there is little or no decay heat and fission products in the fuel will not be used solely to justify returning a system to service that is less than complete. If your understanding is different please notify us.

It is our understanding that prior to fuel load, the discovery phase for all of the Nuclear Performance Plan, Vol. III, Special Programs will be 100% complete for systems required for fuel load with the exception of your program for addressing NRC IE Bulletins 79-02 and 79-14 regarding seismic qualification of large bore piping and supports. For this program, the staff understands that prior to refueling you will review all piping systems required for fuel load using as-built walkdowns and a combination of generic implication evaluations and detailed stress analyses to identify potential modifications, considering those design conditions applicable to the system in the refueling and shutdown modes of operation. All modifications determined to be required for a fuel load system will be completed before Unit 2 fuel load. As discussed in our December 14, 1988 letter to you, the staff has reviewed this approach for evaluating the piping systems at BFN Unit 2 and found it to be acceptable.

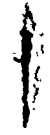
The staff is continuing its review of your seismic design program. To date, our audits have not revealed any significant seismic design issues which would cause any systems, structures, or components at Browns Ferry, Unit 2 to be inoperable. However, resolution of staff audit findings and completion of seismic evaluations which might impact the operability of fuel load systems shall be accomplished in a satisfactory manner consistent with the BFN design basis and Technical Specifications.

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Our reviews indicate that there may be some confusion regarding the use of the term "discovery completion" as it applies to the Restart Test Program. It is our understanding that the Restart Test Program (RTP) is a NPP Special Program with an associated discovery phase. The discovery phase should include completion of the portions of the RTP which confirm operability of the system functions required to support fuel loading. If your understanding is different than this please notify us as soon as practical and provide a followup submittal to clarify this matter.

Your guidelines for deferral of work items identified as required for fuel load contain allowances for compensatory measures or other mitigation activities to be instituted by the Plant Manager. Prior to fuel load, TVA should provide to the resident inspection staff a summary of all such compensatory measures along with the associated operability item deferral forms. This also applies to any compensatory measures to deal with the deficiencies identified through your discovery program, that will not be resolved prior to fuel load. Additionally, a cumulative 50.59 safety evaluation for all of the compensatory measures should be provided to ensure adequate controls and personnel staffing.

Based on the information submitted in the October 21, 1988 letter, the NRC concludes that TVA has identified and has established an acceptable program for implementing the necessary prerequisites for reloading fuel in BFN Unit 2.

If you have any questions concerning this subject, please contact Dan Carpenter at (205) 729-6196.

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

Sincerely,

Original Signed by
Steven D. Richardson

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

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Mr. Oliver D. Kingsley, Jr.

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Browns Ferry Nuclear Plant

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