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SUBJECT: Provides comments & clarification re fuel load issues for fuel load issues.

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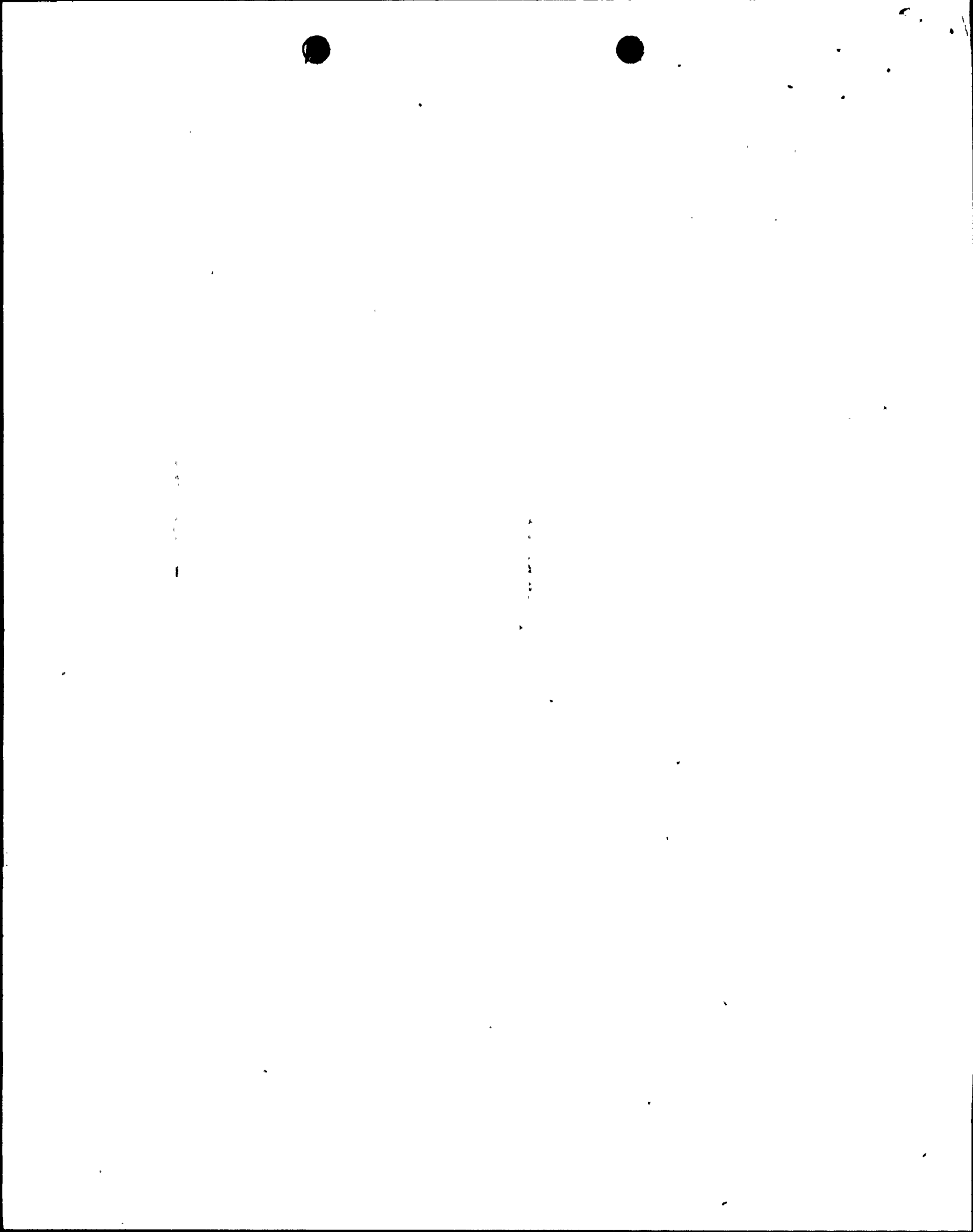
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TENNESSEE VALLEY AUTHORITY

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Gentlemen:

In the Matter of) Docket No. 50-260
Tennessee Valley Authority)

BROWNS FERRY NUCLEAR PLANT (BFN) FUEL LOAD ISSUES FOR UNIT 2 - RESPONSE TO
DECEMBER 30, 1988, LETTER FROM STEVEN D. RICHARDSON (NRC)

- References:
1. NRC Meeting Summary dated September 29, 1988, documenting results of meeting with TVA on September 13, 1988.
 2. TVA Letter from R. L. Gridley to NRC dated October 21, 1988, "Prerequisites for Reloading Fuel in BFN Unit 2."
 3. NRC letter to Oliver D. Kingsley dated December 30, 1988, "Fuel Load Issues for Browns Ferry (BFN) Unit 2."

NRC has documented in reference 3, that TVA has identified and established an acceptable program for reloading fuel in BFN unit 2. In this correspondence, NRC provided comments and requested a response if our understanding was different from NRC's. The purpose of this letter is to provide those necessary clarifications to reference 3.

The evaluation for determining system operability was based on more than just the requirements in technical specifications and the technical basis provided in the Final Safety Analysis Report (FSAR) for BFN. In summary, all available information was utilized, which when combined comprises the safety analysis report (SAR). This includes current information generated since the last FSAR update, ongoing special program evaluation, and the engineering evaluations of a given system.

TVA has not used the fact that there is little or no decay heat and fission products in the fuel as the sole basis to justify returning a system to service. However, little or no decay heat was used as a partial supporting basis to justify returning fuel load systems to service.

TVA concurs with NRC's understanding of the program for addressing NRC Bulletins 79-02 and 79-14, as well as with NRC's understanding of the seismic design program.

The Restart Test Program (RTP) has completed portions of the RTP that confirms operability of the system functions required to support fuel loading.

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TVA has provided the NRC resident inspectors with a summary of all compensatory measures along with the associated operability item deferral forms. Additionally, a cumulative safety evaluation of the compensatory measures to ensure adequate controls and personnel staffing has been performed and is satisfactory for fuel loading. A copy of the cumulative safety evaluation has been given to the site resident inspectors.

If you have any questions, please telephone Patrick P. Carrier at (205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


R. Gridley, Manager
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Regulatory Affairs

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