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AUTH. NAME AUTHOR AFFILIATION
SALAS, P. Tennessee Valley Authority
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Notices of changes to info provided in util 900316
response to GL 89-13 & that actions necessary to address
GL 89-13 completed for BFN Unit 2. O
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Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609

August 17, 1995

10 CFR 50.54 (f)

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

Gentlemen:

In the Matter of)
Tennessee Valley Authority)

Docket Nos. 50-259
50-260
50-296

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

**BROWNS FERRY NUCLEAR PLANT (BFN) - RESPONSE TO GENERIC LETTER
(GL) 89-13 - SERVICE WATER SYSTEM (SWS) PROBLEMS AFFECTING
SAFETY-RELATED EQUIPMENT**

The purpose of this letter is to notify NRC of changes to information previously provided in BFN's original response to GL 89-13. TVA's original response was provided by letter dated March 16, 1990. The rationale for these changes is described below. Additionally, this letter notifies NRC that the actions necessary to address GL 89-13 have been completed for Unit 2.

By letter dated February 2, 1994, TVA notified NRC of its intent to perform a self-assessment of the BFN SWS. TVA submitted a self-assessment plan for NRC approval by letter dated February 16, 1995, and subsequently revised the plan by letter dated March 9, 1995. NRC approved the plan and gave approval to commence with the self-assessment by letter dated April 4, 1995. TVA recently completed the self-assessment of the SWSs, and as a result, discrepancies in the original response to GL 89-13 were identified. These discrepancies have been documented, evaluated, and dispositioned in accordance with BFN's Corrective Action Program.

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U.S. Nuclear Regulatory Commission

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Accordingly, Enclosure 1 is a list of changes to BFN's original response to GL 89-13. At NRC's request, Enclosure 2 is a chronological listing of correspondence related to GL 89-13.

Additionally, as committed by letter dated March 16, 1990, TVA considers that the above changes complete the actions required by GL 89-13. The alternate chemical treatment program for RHRSW identified in the September 1, 1993 letter is completed and functional. We hereby notify NRC that for Unit 2 the recommended or justified alternative actions of GL 89-13 have been implemented and continuing programs are fully established. TVA continues to track active commitments related to GL 89-13 for Units 1 and 3.

There are no new commitments in this letter. If you have any questions please contact me at (205) 729-2636.

Sincerely,



Pedro Salas
Manager of Site Licensing

Enclosure

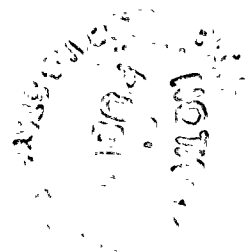
cc: See page 3

Subscribed and sworn to before me
on this 17th day of August 1995.

Barbara A. Blanton

Notary Public

My Commission Expires My Commission Expires 10/06/98



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Enclosure

cc (Enclosure):

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3

LIST OF CHANGES MADE TO BFN'S ORIGINAL RESPONSE
TO GENERIC LETTER (GL) 89-13

1. Page 2, BFN Response to Generic Issue 51, Program A, add the following note (as highlighted): TVA procedures allow a +/- 25 percent tolerance in the frequency of regular Preventive Maintenance (PM) activities.
2. Page 3, BFN Response to Generic Issue 51, Program B, delete the following (as highlighted):

The Residual Heat Removal Service Water (RHRSW) will be modified and incorporated into the existing chemical treatment program, if feasible, or an equally effective alternative will be proposed.

Testing for clam larva is conducted when conditions are conducive to spawning. Plant procedures require chlorination of the Emergency Equipment Cooling Water (EECW) when clam larva spawning is detected or when a pre-established date is reached. Chlorination of the EECW is continued until conditions are no longer conducive to clam spawning.

The current program of RHRSW cleaning and flushing appears to be adequate as discussed in BFN response to NRC Recommended Action, Generic Issue 51, Program C. No macroscopic fouling has been identified to date.

To address RHRSW corrosion, a chemical treatment program is being pursued. However, the RHRSW is an infrequently used system, and makeup flow is low. As such, it may be difficult to maintain an effective chemical concentration. BFN will establish a test program to determine if chemical treatment is feasible. The RHRSW will be modified to provide chemical injection points by BFN Cycle 7 operation (BFN is currently in an extended outage and is scheduled to begin Cycle 6 operation by the end of September, 1990). Within two months of Cycle 7 operation, TVA will incorporate the RHRSW into the existing chemical treatment program, if chemical treatment of the RHRSW is determined to be feasible. Otherwise, BFN will propose an equally effective alternative for the NRC Recommended Action in the followup submittal required to confirm implementation of the actions taken in response to the generic letter.

3. Page 3, first sentence in BFN Response to Generic Issue 51, Program B, add the following (as highlighted): The current BFN chemical treatment program for EECW and RHRSW satisfies the generic letter.
4. Page 4, last paragraph in BFN Response to Generic Issue 51, Program C, delete the following (changes highlighted): The HPFP is not connected to RHRSW or EECW.
5. Page 4, last sentence in BFN Response to Generic Issue 51, Program C, change the sentence from the following (changes highlighted): However, the HPFP is chlorinated twice a year ... Sentence should now read as follows: However, the HPFP is chemically treated ...
6. Page 4, second sentence in BFN Response to Generic Issue 51, Program D, change the sentence from the following (changes highlighted): The current BFN program for chlorination ... Sentence should now read as follows: The current BFN program for chemical treatment ...
7. Page 5, last paragraph in BFN Response to Generic Issue 51, Program D, delete the following (as highlighted): The current BFN inspection program has been effective in ensuring optimum heat exchanger performance. This inspection program will be documented in the preventive maintenance program and will be revised to address the shutdown board room coolers and the H₂O₂ analyzer coolers by December 31, 1990.
8. Page 5, in diesel generator heat exchanger inspection and cleaning frequency, revise as follows: Frequency of inspecting and cleaning Diesel Generator Coolers changed from annually to every two years.
9. Page 6, paragraph at end of heat exchanger inspection and cleaning frequency, add the following note (as highlighted): TVA procedures allow a +/- 25% tolerance in the frequency of regular PM activities.
10. Page 7, (fourth sentence from top of page) BFN Response to NRC Recommended Action III, change the sentence from the following (as highlighted): The preventative maintenance instructions for EECW and RHRSW systems will be revised to require notification of the system engineer if any clams, excessive silt, or other blockage is present when the system is opened. The sentence should now read as follows: Maintenance work requests for EECW and RHRSW systems will require notification of the system engineer if any clams, excessive silt, or other blockage is present when the system is opened.



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11. Page 8, (last sentence of page) BFN Response to NRC Recommended Action V, delete the following (as highlighted):
The instructions are required to be reviewed every 2 years per site procedures.
12. Page 9, (fifth sentence from top of page) BFN Response to NRC Recommended Action V, delete the following (as highlighted): These instructions are required to be reviewed every two years per site procedures.

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3

CHRONOLOGICAL LISTING OF CORRESPONDENCE RELATED TO
GENERIC LETTER (GL) 89-13, "SERVICE WATER SYSTEM
PROBLEMS AFFECTING SAFETY-RELATED EQUIPMENT"

1. NRC issued GL 89-13, dated July 18, 1989
2. TVA letter to NRC, dated March 16, 1990, "Browns Ferry Nuclear Plant (BFN) - Response to Generic Letter (GL) 89-13, Service Water System Problems Affecting Safety-Related Equipment"
3. NRC issued Supplement 1 to GL 89-13, dated April 4, 1990
4. NRC letter to TVA, dated April 23, 1990, "Licensee's Response to Generic Letter 89-13 Regarding Service Water Systems (TAC Nos. 73970, 73971, And 73972)"
5. TVA letter to NRC, dated September 1, 1993, "Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3 Proposed Alternate Chemical Treatment Program For The Residual Heat Removal Service Water (RHRSW) System"
6. TVA letter to NRC, dated February 2, 1994, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Operating And Maintenance (O&M) Cost Reduction Program - Request For NRC Review and Approval of Cost Beneficial Licensing Action (CBLA) - RLA-03: Reduced Scope NRC Service Water System Inspection"
7. TVA letter to NRC, dated February 16, 1995, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Service Water System Operational Performance Inspection (SWSOPI) Self-Assessment Proposal"
8. TVA letter to NRC, dated March 9, 1995, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Service Water System Operational Performance Inspection (SWSOPI) Self-Assessment Proposal - Revision 1"
9. NRC letter to TVA, dated April 4, 1995, "Browns Ferry Nuclear Plant Service Water System Operational Performance Inspection (SWSOPI) Self-Assessment Proposal"
10. TVA letter to NRC dated July 14, 1995, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Service Water System Operational Performance Inspection (SWSOPI) Self-Assessment Report"

