

## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 9, 1998

Mr. C. M. Crane Site Vice President Browns Ferry Nuclear Plant Post Office Box 2000 (PAB 1E) Decatur, Alabama 35609-2000

SUBJECT:

BROWNS FERRY PLANT UNITS 2 AND 3 - RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION REGARDING TECHNICAL SPECIFICATION CHANGE TS-384 REQUEST FOR LICENSE AMENDMENT FOR POWER UPRATE OPERATION (TAC NOS. M99711 AND M99712)

Dear Mr. Crane:

The purpose of this letter is to express our concerns regarding the completeness and timeliness of your responses to our requests for additional information (RAI) relating to your license amendment request for power uprate, and the impact on the schedule for our review.

By letter dated October 1, 1997, Tennessee Valley Authority (TVA) proposed revisions to the Browns Ferry Nuclear Plant, Units 2 and 3 Technical Specifications (TS) to permit operation of the units at the uprated power level of 3458 MWt. Based on its review, the staff issued several RAIs and requested your response to them by specified dates such that our reviews could be completed consistent with your schedule. We find that certain of your responses have not been timely, and several issues and analyses in support of your license amendment are incomplete.

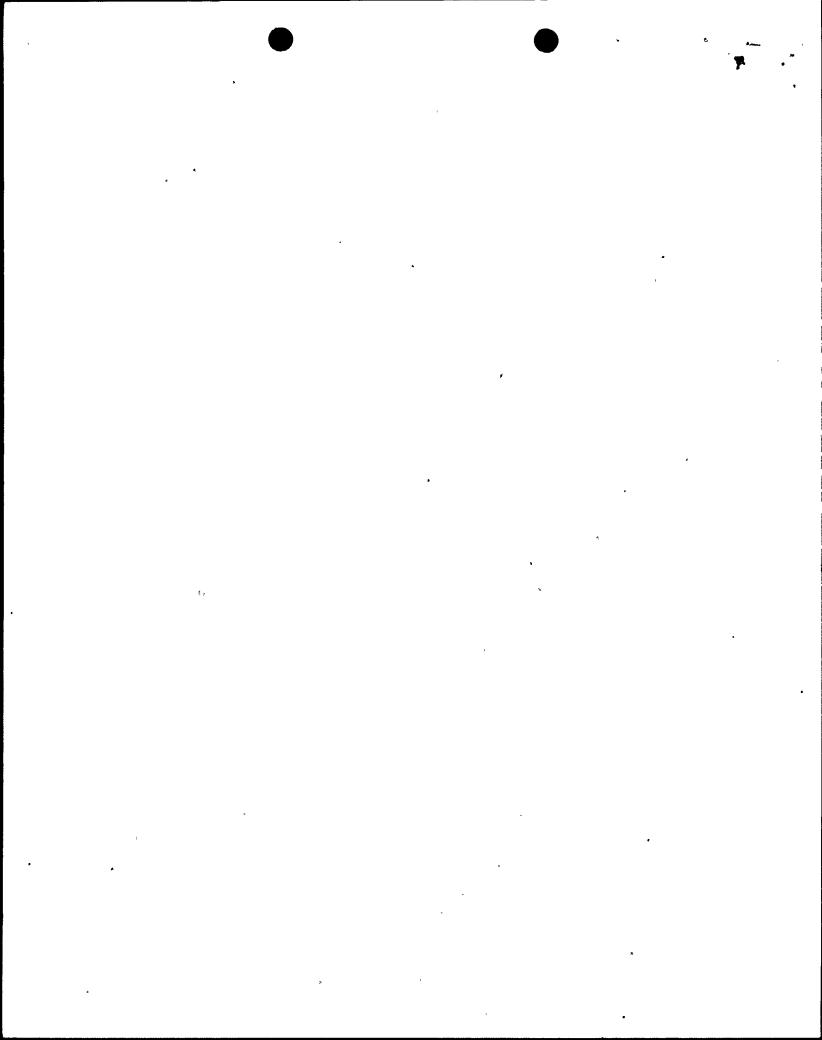
## For example:

- 1. You responded to our February 18, 1998 RAI on April 1, and May 1,1998, instead of by March 15, 1998.
- 2 You responded to our March 13, 1998 RAI on May 20, 1998 instead of April 15, 1998.
- 3. Your original submittal of October 1, 1997, and subsequent letters of March 16, and May 20, 1998, indicate that TVA has not yet completed the Environmental Qualification (EQ) of electrical equipment portion of the power uprate analysis. We understand that this analysis is expected to be completed by the end of June 1998.
- 4. TVA letter of March 16, 1998 indicates that the post accident containment temperature has increased from 322°F to 336°F. Containment integrity has not been demonstrated for the increased temperature.
- 5. TVA letter of March 16, 1998 proposed additional TS changes in support of the power uprate that were not included in the previous submittals.
- 6. In a telephone conversation on May 28, 1998, TVA indicated that its October 1, 1997 submittal may include incorrect data relating to the design basis rod drop accident.

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In a telephone conversation with your staff on May 28, 1998, we discussed our concerns and reiterated the need for providing complete documentation in support of your license amendment request. The complex nature of power uprate and other license amendment requests (e.g., conversion to improved standard technical specifications) and your plans to implement them during the upcoming outage in November 1998 present a challenge to our resources. Therefore, it is imperative that you provide quality and comprehensive submittals, and timely responses to our RAIs such that we can complete our review of your requests consistent with your schedule. We find that your schedule for completing supporting documentation (i.e., Items 3, 4, 5, and 6 above) may not permit completion of our review consistent with your requested approval of the license amendment by July 1, 1998 for Unit 3, and reflects a need to improve your planning of licensing submittals.

We request that you implement appropriate corrective actions to improve your performance in planning your licensing activities.

, If you have any questions, please write or call me at (301) 415-1471.

Sincerely, (Original Signed By)

L. Raghavan, Senior Project Manager Project Directorate II-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

cc: See next page

Docket No. 50-260, 50-296

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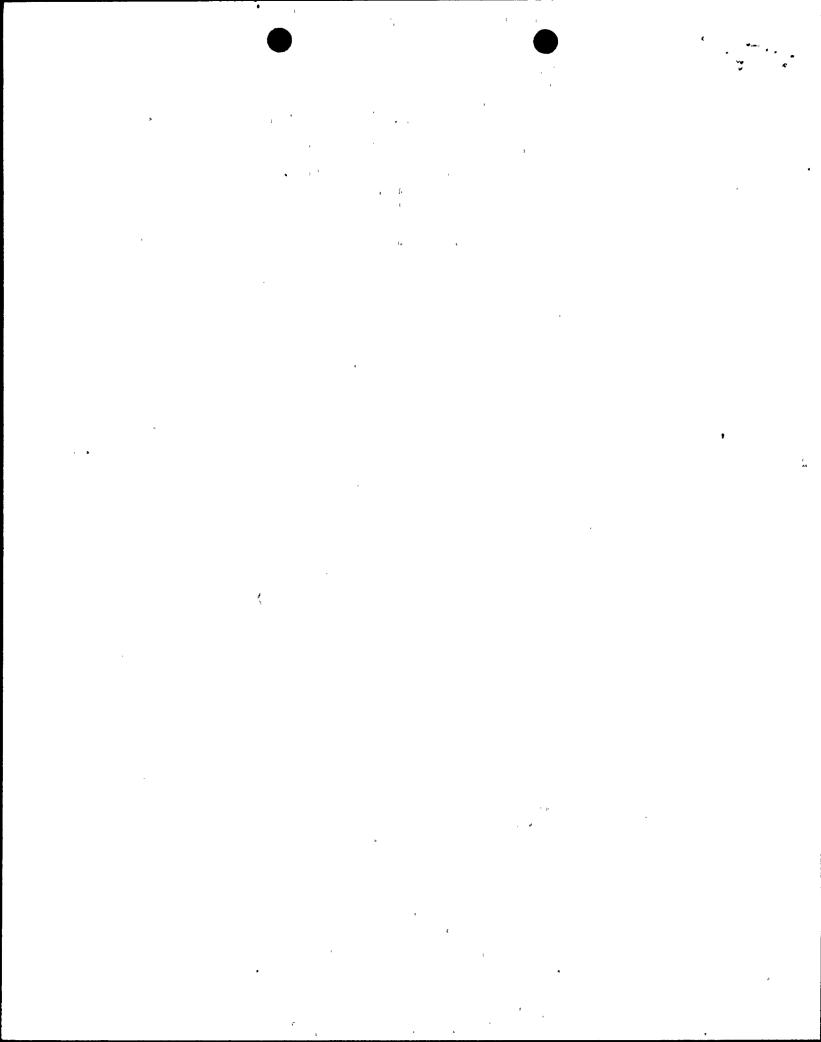
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Mr. O. J. Zeringue Tennessee Valley Authority

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