



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, DC 20555 - 0001**

April 17, 2019

Ms. Margaret M. Doane
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**SUBJECT: ACRS REVIEW OF APPLICATIONS FOR OPERATION IN THE
EXPANDED POWER TO FLOW DOMAIN**

Dear Ms. Doane:

During the 662nd meeting of the Advisory Committee on Reactor Safeguards, April 4-5, 2019, we evaluated our involvement in reviews of the License Amendment Request (LAR) in the expanded power to flow domain, such as the Maximum Extended Load Limit Analysis Plus (MELLLA+) operating domain. Our discussion was informed by materials presented at the March 19, 2019, meeting of the ACRS Power Uprates Subcommittee in which representatives from the staff and their consultants reported their progress on a review of the license amendment request (LAR) by Tennessee Valley Authority (TVA) for Units 1, 2, and 3 of the Browns Ferry Power Plant (Browns Ferry) and on other activities affecting operation in the expanded power to flow domain. Representatives from TVA also provided input regarding their Browns Ferry LAR during this Subcommittee meeting.

The staff has established a mature process for completing reviews on this topic and applied this process to a range of BWR designs. In more complex cases, such as ones in which a licensee combines methods developed by multiple vendors, the staff completes TRACE confirmatory calculations to increase confidence that appropriate uncertainties are considered by the licensee.

Hence, we conclude:

- No additional ACRS review of the TVA MELLLA+ LAR for Browns Ferry is required unless there are substantive changes in the status that the staff provided on March 19, 2019.
- ACRS participation in future reviews of this topic is not required unless a new LAR involves substantive differences from the plant designs and conditions that have been approved.

We request that the staff continue to inform us of future activities relevant to this topic that might impact the above conclusions.

Sincerely,

/RA/

Peter C. Riccardella
Chairman

REFERENCES

1. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus," February 23, 2018 (ADAMS Accession No. ML ML18079B140 and ML18086A088 (proprietary)).
2. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus – Supplement 1," March 7, 2018 (ADAMS Accession No. ML18067A495 and ML18067A497 (proprietary)).
3. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus – Supplement 2, Operator Training Results," July 23, 2018 (ADAMS Accession No. ML18205A498).
4. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus – Supplement 3, Responses to Requests for Additional Information," December 14, 2018 (ADAMS Accession No. ML18348B156).
5. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus – Supplement 4, Responses to Requests for Additional Information," December 13, 2018 (ADAMS Accession No. ML18347B381 and ML18347B382 (proprietary)).
6. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus – Supplement 5, Responses to Requests for Additional Information," January 16, 2019 (ADAMS Accession No. ML19016A429, ML19016A430 (proprietary), and ML19016A431 (proprietary)).
7. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus – Supplement 6, Additional Operator Training Results," January 16, 2019 (ADAMS Accession No. ML19016A435).
8. Tennessee Valley Authority, "Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus –

Supplement 7, Responses to Requests for Additional Information,” January 25, 2019 (ADAMS Accession No. MI19025A204 and ML19025A205 (proprietary)).

9. Tennessee Valley Authority, “Proposed Technical Specifications (TS) Change TS-510 – Request for License Amendments – Maximum Extended Load Line Limit Analysis Plus – Supplement 8, Additional Operator Training Information,” March 13, 2019 (ADAMS Accession No. ML19072A122).
10. U.S. Nuclear Regulatory Commission, “Browns Ferry Maximum Extended Load Line Limit Plus (MELLLA+) Safety Evaluation Overview” (Official Use Only), February, 2019.

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