TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

500A Chestnut Street Tower II

TVA BFNP TS 147

AUG 28 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Denton:

In the Matter of the ) Docket No. 50-296
Tennessee Valley Authority )

In a letter to you dated August 26, 1980, from L. M. Mills we submitted 40 copies of a requested amendment to operating license DPR-68 for the Browns Ferry Nuclear Plant unit 3 (TVA BFNP TS 147). In response to telephone discussions with members of your staff we are enclosing additional justification for the proposed technical specification changes submitted by the referenced letter. Your continued cooperation in reviewing this expedited request is appreciated.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. L. Cross

Jimmy L. Cross
Executive Assistant
to the Manager of Power

Subscribed and sworn to before
me this 28th day of Aug. 1980.

Bryant McLowery
Notary Public

My Commission Expires 4/4/82

Enclosure
cc: See page 2

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Mr. Harold R. Denton

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cc (Enclosures):
Mr. Charles R. Christopher
Chairman, Limestone County Commission
P.O. Box 188
Athens, Alabama 35611

Dr. Ira L. Myers
State Health Officer
State Department of Public Health
State Office Building
Montgomery, Alabama 36104

BROWNS FERRY NUCLEAR PLANT UNIT 3
ADDITIONAL JUSTIFICATION FOR TECHNICAL SPECIFICATION
CHANGE REQUEST BFNP TS 147

The proposed technical specification change will allow maintenance of the Browns Ferry unit 2 2B RHR heat exchanger without necessitating the shutdown of Browns Ferry unit 3.

To perform the required heat exchanger maintenance, both the RHR and RHRSW lines must be isolated. Isolation of the RHRSW line to the 2B heat exchanger isolates the standby coolant supply (RHRSW supply) from unit 2 to unit 3. Technical Specification 3.5.C.3 (unit 3) presently states that "During power operation, both RHRSW pumps B1 and B2 normally or alternately assigned to the RHR heat exchanger header supplying the standby coolant supply connection must be operable." Although the proposed maintenance activity will not affect the operability of the 1B and 2B RHRSW pumps, it will isolate the RHR heat exchanger header supplying the standby coolant supply connection. TVA believes that isolation of the heater violates the intent of specification 3.5.C.3. Therefore, unit 3 must be shutdown before maintenance can be performed on unit 2 2B RHR heat exchanger.

Standby coolant flow from unit 2 to unit 3 is through the RHR cross-connection line. Loss of RHR cross-connection flow path (by line blockage, etc.) will result in a loss of standby coolant flow capability. Since no credit for cross-connected RHR flow is taken in the Appendix K analysis in the FSAR and because of the very low probability of ever needing RHR pumps and heat exchangers to supply an adjacent unit, a 10-day repair time for RHR cross-connection flow capability is justified and authorized by Technical Specification 3.5.B.13. Similarly, no credit for standby cooling capability through the RHR cross-connection line is taken in the Appendix K analysis in the FSAR and there exists a very low probability of ever needing this redundant backup source of cooling water.

Therefore, the proposed technical specification change to allow a 10-day repair time for standby coolant supply is justified and the overall reduction in plant safety margin would be insignificant.

Because the 2B RHR heat exchanger is on the cross connection in unit 2, a 30-day limiting condition for operation is in effect for Browns Ferry unit 3 under unit 3 Technical Specification 3.5.B.12. This 30-day period will expire on September 15, 1980. We estimate that a minimum of 5 days will be required to effect repairs to the heat exchanger. Repairs must be completed by September 15, 1980, to avoid the shutdown. We believe that we must have approval of this requested technical specification change by September 8, 1980, in order to avoid shutdown of unit 3 to begin the repair work.

Additionally, Browns Ferry unit 2 is scheduled to begin a refueling outage on September 5, 1980. Having units 2 and 3 shutdown concurrently would have a significant impact on our power supply situation.