

POOR ORIGINAL

400 Chestnut Street Tower II

December 17, 1980

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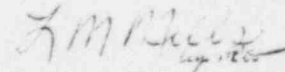
Ms. Reba M. Diggs
Facilities Program Coordinator
License Fee Management Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Ms. Diggs:

This is in response to your letter to me dated December 3, 1980, concerning final fee determination for Browns Ferry Nuclear Plant technical specification changes. We do not contest the fee determination for TS 153, and supplement to TS 140 and TS 148 and have made arrangements for payment of the fees. However, we do not agree with the NRC's classification and fee determination for TS 145 and TS 151. We continue to believe that no additional payment is required for these technical specification changes. Enclosed are our reasons why we believe the fees are incorrect.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

1. TS 145 - letter dated August 13, 1980--We not agree with the classification of this request for license amendment as a Class III. The license contains values of Maximum Average Planar Linear Heat Generation Rate (MAPLHGR), a core operating parameter, versus exposure of the reactor fuel in megawatt-days per tonne (MWD/t). The license, as originally issued, contained values of MAPLHGR out to a fuel exposure of 30,000 MWD/t. The requested license amendment only sought to extend the values of MAPLHGR beyond 30,000 MWD/t by adding a value for 35,000 and 40,000 MWD/t. The license amendment was needed for continued facility operation because the fuel was reaching and exceeding 30,000 MWD/t exposure. The acceptability of higher exposure in BWR fuel was being reviewed generically by the NRC staff before submittal of TS-145. IE Information Notice 80-04 documents that similar license amendments had been previously approved. Since this license amendment only extended the exposure values of an accepted core operating parameter, we do not believe that it involved a safety issue. We continue to believe this to be an administrative Class II amendment.

2. TS 151 - TVA letter dated September 24, 1980--This request for license amendment requested revisions to the technical specification bases regarding the time delays normally experienced in the control rod drive system scram solenoid circuitry. The existing specifications state that a 390 millisecond time delay would be allowed in the analytical treatment of operational transients. We received notification from the General Electric Company (GE) that the technical specification bases were incorrect in that a time delay of 290 milliseconds is used in the Browns Ferry transient analyses. The requested license amendment corrects this value for circuitry time delay. Historically, GE has performed all transient analyses for Browns Ferry. Recording the time delay in the bases is done only to provide general information. No safety concerns or limits arise directly from the technical specification bases. All safety-related limits, which the operating facility must comply with, are given in the technical specification Limiting Conditions for Operation (LCO's); in this case the control rod insertion times. The existing insertion time LCO's include the actual time delays which the plant actually experiences. By complying with the appropriate LCO's, safe operation of Browns Ferry is assured. Because no changes were proposed to the LCO's, no safety issues were involved. We believe the the Class II amendment fees provided with the September 24, 1980, letter are appropriate.