## TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

May 13, 1981

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 Tennessee Valley Authority Docket Nos. 50-259 50-260 50-296

This letter summarizes the conclusions reached in a May 8, 1981 conference call with R. J. Clark and T. A. Ippolito, of your staff, representatives of I&E Region II, and TVA concerning interpretation of secondary containment requirements for Browns Ferry Nuclear Plant.

As indicated in our April 29, 1981 letter to you on this subject, it is recognized that secondary containment is the reactor building, and that the opening of inner doors or removal of equipment transfer hatches does not compromise overall secondary containment. Secondly, in the hypothetical event of breach of secondary containment in a particular zone, operation could continue in the remaining zones provided that the secondary containment surveillance tests (ability of standby gas treatment system to maintain a 1/4-inch water negative pressure) could be demonstrated as stipulated in the present technical specifications. If the surveillance test could not be passed, then the appropriate actions would be taken based on the existing technical specifications. In any case, the internal zone isolation dampers and doors would constitute the new zone boundaries. It was noted that double doors exist between all inner zones. TVA acknowledged that the inner doors were not interlocked doors, but since loss of secondary containment through a breach is such an unusual event, administrative control over these doors by securing or by providing door watches was reasonable and sufficient. Based on the results of this conference call, we will not be providing additional technical specification changes as previously indicated in my April 29, 1981 letter to you.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager

Nuclear Regulation and Safety

Subscribed, and sworn to before M day of

Commission Expires

An Equal Opportunity Employer