TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

May 11, 1981

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U.S. NUCLEAR REGULATORY COMMISSION

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

In my letter to you dated March 18, 1981, TVA requested an exemption for Browns Ferry Nuclear Plant from the requirements of section III.G of 10 CFR Part 50, Appendix R, Fire Protection Rule. We wish to modify our previous request as stated in the enclosure. The enclosure addresses our positions on each section of 10 CFR Part 50, Appendix R, which is applicable to Browns Ferry.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Sworn to and subscribed before me
this 11th day of May 1981
Paulette H. White
Notary Public
My Commission Expires 9-5-84

Enclosure

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ENCLOSURE

TVA REQUEST FOR EXEMPTION TO SCHEDULE REQUIREMENTS OF APPENDIX R TO 10 CFR PART 50 (FIRE PROTECTION PROGRAM FOR NUCLEAR FACILITIES WITH AN OPERATING LICENSE) BROWNS FERRY NUCLEAR PLANT

This request for an exemption to the schedule requirements of Appendix R to 10 CFR Part 50 supercedes and revises our request submitted on March 18, 1981. Our review of Appendix R indicates that three sections contain new requirements that are to be retroactively applied to Browns Ferry. The following discussions state our position on the three sections as applied to Browns Ferry:

1. Section III.G - Fire Protection for Safe Shutdown Capability

The modifications made during the recovery from the March 22, 1975 fire were intended to provide protection against the loss of more than one division of safety equipment in the event of a fire. The modifications included physical moving of certain electrical conduits, the application of a fire resistant cable coating, and the addition of extensive fire protection systems. These changes and the plant's original separation criteria for Class IE circuits, as outlined in our Final Safety Analysis Report, are consistent with the philosophy outlined in section III.G.1. However, the design was never intended to satisfy the stringent separation criteria outlined in section III.G.2. This is not to suggest that the design is inadequate, only that the level of compliance with section III.G.2 is unknown. We, therefore commit to performing an analysis to determine if further modifications would be needed, in regard to separation of safe shutdown capabilities, to comply with the requirements of section III.G.2.

10 CFR Part 50.48(c)(5) requires that TVA submit plans and schedules for modifications dictated by section III.G.3, if such are necessary. We request an extension until June 1, 1982 to allow us time to complete the analysis; and for any necessary modifications, to prepare plans and schedules that would not be detrimental to overall plant safety. Following completion of the analysis, we would like to meet with your staff to discuss the results of our analysis and come to an agreement as to those modifications that we and the NRC staff deem necessary in order to comply with section III.G.2.

2. Section III.J - Emergency Lighting

The emergency lighting design at Browns Ferry consists of a 250-volt dc system installed in areas needed for safe shutdown. The system does not cover fire access or egress routes and does not have an 8-hour capacity. TVA therefore commits to providing self-contained lighting units which will satisfy the requirements of this section by November 19, 1981.

3. Section III.O - Oil Collection System for Reactor Coolant Pumps

Since the Browns Ferry containment has an inerted atmosphere during normal operation, the requirements of this section are not applicable.