Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

FEB 27 1991

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
		50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - CONTAINMENT ISOLATION VALVES ASSOCIATED WITH THE CONTAINMENT ATMOSPHERIC DILUTION SYSTEM

References: 1) TVA letter, dated August 2, 1988, BFN Technical Specification No. 251 - Table 3.7.A - Containment Isolation Valves

2) TVA letter, dated July 3, 1990, BFN Technical Specification No. 284 - Post-Accident Sampling System and Automatic Depressurization System

The referenced letters submitted requests for amendments to the BFN Technical Specifications. These submittals included proposed revisions to Table 3.7.A, "Primary Containment Isolation Valves." TVA and NRC met on February 6, 1991, and held a teleconference on February 13, 1991, to discuss the containment isolation provisions associated with the Containment Atmosphere Dilution (CAD) system lines which provide nitrogen to the Automatic Depressurization System accumulators.

NRC expressed a concern with the adequacy of the current system configuration from a containment isolation reliability standpoint. The current arrangement considers one check valve inside containment and two check valves in parallel outside containment as primary containment isolation valves. NRC requested TVA consider using the normally closed manual valves on the CAD lines as the containment isolation valve in lieu of the outboard check valve.

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In response to this concern, TVA has successfully performed local leak rate testing of these valves (2-84-613, 2-84-614, 2-84-674, and 2-84-675). TVA will replace the Unit 2 outboard CAD primary containment check valve in each train with a qualified normally closed solenoid valve and a normally closed manual bypass valve prior to restart from the next refueling outage. TVA will submit a Technical Specification amendment request to formally cite these valves as primary containment isolation valves within one hundred twenty days after Unit 2 restart. TVA will request this Technical Specification amendment be implemented prior to restart from the next Unit 2 refueling outage. As part of the implementation of this Technical Specification, TVA will formally include these valves in the 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors" program. A similar modification will be implemented on Browns Ferry Units 1 and 3 prior to the restart of each respective unit.

TVA believes these actions and commitments resolve the NRC concerns regarding this issue. As previously requested, TVA requests the issuance of the referenced Technical Specifications as soon as possible in order to support the return to service of Browns Ferry Unit 2.

A summary list of commitments contained in this letter is enclosed. If you have any questions, please contact Patrick P. Carier, Manager of Site Licensing, at (205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Mark J. Burzynski /DR

E. G. Wallace, Manager
Nuclear Licensing and
Regulatory Affairs

Enclosure
cc: See page 3

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cc (Enclosure):
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ENCLOSURE

BROWNS FERRY NUCLEAR PLANT - SUMMARY OF COMMITMENTS

1. TVA will replace the Unit 2 outboard Containment Atmosphere Dilution primary containment check valve in each train with a qualified normally closed solenoid valve and a normally closed manual bypass valve prior to restart from the next refueling outage. A similar modification will be implemented on Browns Ferry Units 1 and 3 prior to the restart of each respective unit.

2. TVA will submit a Technical Specification amendment request to formally cite these valves as primary containment isolation valves within one hundred twenty days after Unit 2 restart.