



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

MAR 22 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) - FOLLOW-UP TO TVA/NRC MEETING OF JANUARY 29, 1991, CONCERNING TVA CLARIFICATION OF NUREG 0737, ITEM II.B.2.2, PLANT MODIFICATIONS, SUBMITTED NOVEMBER 13, 1990.

The purpose of this letter is to withdraw a November 13, 1990, submittal which provided clarification of NUREG 0737, Item II.B.2.2, Plant Modifications.

Background

NUREG 0737, Item II.B.2, Plant Shielding, requested that licensees "perform a radiation and shielding-design review of the spaces around systems that may, as a result of an accident, contain highly radioactive material." It clarified that "any area which may require occupancy to permit an operator to aid in the mitigation of or recovery from an accident is designated as a vital area."

As reported in a January 17, 1980, TVA letter to the NRC staff, TVA evaluated access to vital areas and concluded that no vital area required post-accident occupancy. An NRC Safety Evaluation Report dated March 8, 1983, concurred with this position and concluded that the requirements of NUREG 0737, Item II.B.2.2, have been met.

November 13, 1990 Clarification

On November 13, 1990, TVA documented the resolution of an environmental qualification (EQ) issue related to 480 Volt RMOV boards 2D and 2F. An element of the resolution of this issue was the introduction of a new manual actuation (i.e., actuation of the Residual Heat Removal (RHR)

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suppression pool cooling valves). Specifically, following a Reactor Water Cleanup (RWCU) line break outside primary containment, entry into the reactor building is now required to de-energize and manually actuate the RHR suppression pool cooling valves.

As noted in the submittal, a RWCU line break would be sensed as an operational transient and would not result in either a turbine trip or reactor protection system actuation. TVA concluded that core uncover and any subsequent fuel failure would not occur as a result of a RWCU line break.

In the November 13, 1990 letter, TVA also clarified the January 17, 1980, position on NUREG 0737, Item II.B.2.2. This clarification was based on a conservative regulatory interpretation: TVA did not segregate events that do not result in fuel failure.

However, additional review of this item by TVA and discussions with the NRC staff indicate that NUREG 0737, Item II.B.2.2, applies to accidents which result in fuel failure (i.e., results in release of "highly radioactive material") and not to all accidents which require entry into the reactor building.

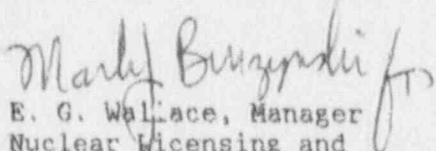
Withdrawal of Clarification

TVA withdraws the clarification of NUREG 0737, Item II.B.2.2, Plant Modifications, provided as Enclosure 2 to the submittal of November 13, 1990. This withdrawal is based on analysis which shows the RWCU line break to be an operational transient which does not result in fuel failure.

However, TVA does not withdraw Enclosure 1 and Enclosure 3 of the November 13, 1990, submittal and will maintain all commitments made in this previous submittal. Those enclosures provided the NRC staff with a description of the method used to resolve the EQ issue related to 480 Volt RMOV Boards 2D and 2E.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


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cc: see page 3

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