



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 19, 1993

Docket Nos. 50-259, 50-260
and 50-296

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford, Vice President
Nuclear Assurance, Licensing and Fuels
3B Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Dr. Medford:

SUBJECT: GENERIC LETTER 87-02, SUPPLEMENT 1 RESPONSE - BROWNS FERRY NUCLEAR
PLANT (TAC NCS. M69430, M69431, AND M69432)

By letter dated September 21, 1992, the Tennessee Valley Authority (TVA), submitted its response to Supplement No. 1 to Generic Letter (GL) 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46," for the Browns Ferry Nuclear Plant (BFN), Units 1, 2 and 3. Supplement No. 1 was issued to all USI A-46 plants on May 22, 1992. This supplement transmitted the NRC Supplemental Safety Evaluation Report (SSER) No. 2 on the final version of the Seismic Qualification Utility Group's (SQUG) Generic Implementation Procedure (GIP), Revision 2, as corrected on February 14, 1992 (GIP-2). By letter dated November 19, 1992, the NRC staff issued a safety evaluation of TVA's GL 87-02, Supplement 1 response. This safety evaluation concluded that certain aspects of TVA's response were unclear or unacceptable, and as such additional information was required. TVA submitted its response to the staff's request for additional information by letter dated January 19, 1993.

In addition to reviewing the information contained in TVA's January 19, 1993 response the staff held a conference call with TVA on March 3, 1993. During this conference call, TVA clarified that, for resolution of USI A-46, it did commit to comply with the entire GIP-2, including both the SQUG commitments and the implementation guidance. The NRC staff has now completed its review of TVA's responses to GL 87-02, Supplement 1. The detailed results of this review are documented in the enclosed supplemental safety evaluation.

The staff considers TVA's commitment to comply with GIP-2 is an acceptable method for resolving USI A-46 at BFN. The staff also accepts TVA's commitment to complete its USI A-46 implementation program at BFN, Units 2 and 3, by March 19, 1996. Furthermore, the staff finds it acceptable for TVA to complete the portion of its USI A-46 program for BFN, Unit 3 that pertains to conduit (not flexible conduit) and cable trays, including their supports, prior to Unit 3 restart in lieu of prior restart commitments. TVA's schedule for completing its USI A-46 implementation program at Unit 1 has been previously approved by the staff.

In its letter of November 19, 1992, the staff also requested TVA to provide additional information as to how it intended to resolve concerns with flexible

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conduit at BFN Units 1, 2 and 3. With regard to flexible conduit not attached to electrical equipment covered by 10 CFR 50.49 (i.e., important to safety but located in a mild environment), TVA indicated that it plans to evaluate such conduit using GIP-2, Section 8 and Appendix D. The staff accepts TVA's planned approach. However, GIP-2, Appendix D does not prescribe a specific procedure or criteria for performing these evaluations. Therefore, TVA is requested to provide a description of the general approach, including the procedure and acceptance criteria, that it will use to evaluate the seismic adequacy of flexible conduit not attached to electrical equipment covered by 10 CFR 50.49.

With regard to flexible conduit attached to electrical equipment covered by 10 CFR 50.49, the staff notes that this issue is not entirely within the scope of USI A-46, and in the future, should be addressed separately from USI A-46. However, since the issue was identified during the review of TVA's original response to GL 87-02, Supplement 1, the staff has included it in the enclosed supplemental safety evaluation. For Units 1 and 3, the staff considers TVA's plan to inspect and evaluate this flexible conduit prior to unit restart, using the interim criteria approved for Unit 2 restart, is acceptable on an interim basis to support unit restart efforts. TVA is requested to submit its long term criteria for staff review and approval, or alternatively, provide a justification why the interim criteria used for Unit 2 restart is adequate for long term application for Units 1, 2 and 3. Any future submittals concerning flexible conduit attached to electrical equipment covered by 10 CFR 50.49 should be made separate from the resolution of USI A-46.

All additional information requested by this letter should be submitted to the NRC no later than September 30, 1993.

This requirement affects 9 or fewer respondents and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by Thierry M. Ross for

Frederick J. Hebdon, Director
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Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Supplemental Safety Evaluation

cc w/enclosure:
See next page

OFC	PDII-4/LA	PDII-4/PM	PDII-4/PM	PDII-4/D
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DATE	3/19/93	3/19/93	3/19/93	3/19/93

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