



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 25, 1994

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

LICENSEE: Tennessee Valley Authority (TVA)
FACILITY: Browns Ferry Nuclear Plant, Units 1, 2, and 3
SUBJECT: SUMMARY OF THE JANUARY 27, 1994 MEETING WITH THE TENNESSEE VALLEY
AUTHORITY REGARDING CHANGES TO THE FIRE PROTECTION REPORT AT THE
BROWNS FERRY NUCLEAR PLANT

Introduction

On January 27, 1994, a meeting was held between representatives of the NRC staff and the Tennessee Valley Authority (TVA) in Rockville, Maryland. This meeting discussed issues regarding recent changes made by TVA to the Fire Protection Report (FPR) for the Browns Ferry Nuclear Plant (BFN). Meeting attendees are listed in Enclosure 1. A copy of the hand-out used by TVA is provided in Enclosure 2.

Background

The BFN NRC Resident Inspectors had identified a concern regarding recent FPR changes in Inspection Report 50-259/50-260/50-296 93-39. On October 29, 1993, TVA had discovered a potential problem which could compromise the capability of two containment isolation valves to function given certain postulated fires. These valves were required to close and isolate reactor water cleanup (RWCU) system piping which is not designed for temperatures greater than 150°F. If, in the event of a fire, these valves fail to close, or spuriously open, then the integrity of the low temperature piping could be compromised. Failure of this piping would affect the ability to maintain reactor coolant system inventory, and therefore compromise the plant's safe shutdown capability.

At the time this problem was discovered, TVA's Fire Protection Report invoked a Technical Specification (TS) action as a compensatory measure for these valves in the event they were unable to perform their safe shutdown function. This action would require the valves be closed if they were inoperable. TVA realized that for purposes of the TS, the valves met applicable operability criteria. Closure of the valves would be an unnecessary burden on plant operations, and would not guarantee the safe shutdown function of the valves unless measures were taken to prevent spurious opening. Therefore, TVA changed the FPR to permit a fire watch to be instituted as an alternative to the TS action. TVA realized similar problems existed for many other components affected by the FPR. Therefore, TVA changed the FPR to permit fire watches for all components which previously had invoked only the TS action associated with the affected components. These changes involved a total of 112 line-items, including the original RWCU isolation valves.

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The resident inspectors questioned these changes, asserting that they may have reduced the plant's ability to achieve and maintain a safe shutdown condition. This issue was documented in the inspection report referenced above, and was assigned Unresolved Item number 93-39-01. TVA believes the changes were appropriate, and did not reduce the safe shutdown capability. TVA requested this meeting to present their arguments.

Presentation and Discussion

TVA reviewed the sequence of events regarding the RWCU components discussed above. Prompt action had been taken to post a fire watch before the formal review of the issue was completed. As noted, TVA believes the original compensatory actions were inappropriate, so a procedure change was initiated. The staff questioned TVA on several aspects of this change. Concerns included the suitability of the revision, adequacy of the supporting safety evaluation, and whether the problem should have been reported in accordance with 10 CFR 50.72 or 10 CFR 50.73.

Discussion of the suitability of the procedure revision addressed two points. First, the resident inspectors were concerned whether fire watches provided an adequate compensatory action vs. the original TS actions. SPLB representatives noted that fire watches are a common compensatory action, though the staff has seen additional actions, such as additional temporary procedure changes and/or staging materials to work around potential problems. TVA's procedures include provisions to perform a temporary alteration that allows the affected equipment to perform its intended function.

The staff also expressed concern regarding the timeliness of required actions. For the RWCU valves, the original procedure would require that the valves be closed within four hours. The revised procedure requires posting a fire watch within seven days. The staff questioned why the longer action period is appropriate. TVA noted that the original action was not a sufficient response by itself, because it did not address the potential for spurious valve actuation. TVA's position is that the revised actions need to be considered as a whole, so focusing on the time allowed to post the fire watch vs. the time allowed to close the valves does not consider the overall effectiveness of the compensatory actions.

The staff also questioned the adequacy of the safety evaluation performed to justify the proposed change. The BFN Unit 2 license permits TVA to make changes to the fire protection program without prior NRC approval only if those changes do not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. TVA reviewed the safety evaluation, and pointed out how it was determined that the plant safe shutdown capability was not adversely affected. TVA noted that it realized its procedure for performing this evaluation was not as rigorous as might be desired. Therefore, TVA has subsequently changed their safety evaluation procedure to provide an explicit discussion of the effects of a change on safe shutdown capability.

TVA stated that it did not believe that the original RWCU problem was reportable under the requirements of 10 CFR 50.72 or 10 CFR 50.73. TVA does

not believe that this problem fits the guidance provided in NUREG-1022, which elaborates on the staff's expectations for event reporting.

The current Browns Ferry Appendix R program is based on only BFN Unit 2 operating, with the other two BFN units shut down. In December 1992, TVA submitted a revised Appendix R safe shutdown procedure which includes power operation by BFN Unit 3. TVA has recently committed to update this submittal to address changes made to the Unit 2 program. Staff review of the combined Unit 2/Unit 3 program will assess the suitability of TVA's compensatory measures.

Original signed by

Joseph F. Williams, Project Manager
 Project Directorate II-4
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Enclosures:

1. Attendance List
2. TVA Handout

cc w/enclosures:

See next page

Distribution

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DATE	2/24/94	2/25/94	2/25/94	2/25/94	

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Randy Mundy	TVA/Browns Ferry
James J. Raleigh	Southern Technical Services, Inc.
Robert J. Moll	TVA/Browns Ferry
Joel T. Munday	NRC/Resident Inspector
Charles Patterson	NRC/Sr. Resident Inspector
J. E. Maddox	TVA/Browns Ferry
K. S. West	NRC/Plant Systems Branch
Amarjit Singh	NRC/Plant Systems Branch
Fred Hebdon	NRC/PD II-4
Pedro Salas	TVA/Browns Ferry Licensing Manager
Paul Kellogg*	NRC/Region II

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Dr. Mark O. Medford, Vice President
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BFN FIRE PROTECTION PROGRAM COMPENSATORY MEASURES

AGENDA

- | | | |
|------|---|--------------|
| I. | OPENING REMARKS | P. SALAS |
| II. | REACTOR WATER CLEANUP (RWCU)
VALVE CABLE PROXIMITY ISSUE | J. E. MADDOX |
| III. | CHANGES TO COMPENSATORY MEASURES
IN UNIT 2 SAFE SHUTDOWN PROGRAM | J. E. MADDOX |
| IV. | SIGNIFICANCE OF PROGRAM CHANGE | J. E. MADDOX |
| V. | CLOSING REMARKS | P. SALAS |

I. OPENING REMARKS

- PROVIDE ADDITIONAL INFORMATION ABOUT RECENT CHANGES TO COMPENSATORY MEASURES IN BFN's UNIT 2 APPENDIX R SAFE SHUTDOWN PROGRAM.
- DISCUSS THE REACTOR WATER CLEANUP ISOLATION VALVE CABLE PROXIMITY ISSUE.
- DISCUSS COMPENSATORY MEASURES.
- SHOW BFN PROGRAM IS CONSISTENT WITH NRC GUIDANCE AND PRESERVES THE ABILITY TO ACHIEVE AND MAINTAIN SAFE SHUTDOWN IN THE EVENT OF A FIRE.

II. REACTOR WATER CLEANUP (RWCU) VALVE CABLE PROXIMITY ISSUE

- WHILE PREPARING SAFE SHUTDOWN ANALYSIS FOR UNIT 3, IDENTIFIED POTENTIAL UNIT 2 RWCU VALVE CABLE PROXIMITY CONCERN.
- RWCU SITUATION CAUSED BY PERSONNEL OVERSIGHT.
- RWCU VALVES REMAINED OPERABLE.
- POSTED FIRE WATCH.
- MODIFICATION DEVELOPED AND SCHEDULED.

III. CHANGES TO COMPENSATORY MEASURES IN UNIT 2 SAFE SHUTDOWN PROGRAM

- **RWCU SITUATION IDENTIFIED NEED TO CHANGE PROGRAM.**
- **BFN APPENDIX R SAFE SHUTDOWN PROGRAM OVERVIEW.**
- **COMPENSATORY MEASURE CHANGE APPROPRIATE.**
- **SAFETY ASSESSMENT PERFORMED.**

IV. SIGNIFICANCE OF PROGRAM CHANGE

- CHANGE DID NOT ADVERSELY AFFECT ABILITY TO ACHIEVE AND MAINTAIN SAFE SHUTDOWN.
- CHANGE CONSISTENT WITH COMPENSATORY MEASURES SPECIFIED FOR OTHER FSSD EQUIPMENT.

FOR EXAMPLE:

- Safe shutdown success path for Fire Zone 2-2 requires that Diesel Generators A, B, 3A, 3B, and 3C be available.
 - Type "A" compensatory measures specified for diesel generators A and B (TS LCO).
 - Type "B" compensatory measures specified for diesel generators 3A, 3B, and 3C.
 - Each diesel generator is equally important for FSSD.
 - Difference in compensatory measure due to location in TS (i.e., Unit 2 or Unit 3).
 - Programmatically, either compensatory measure is equivalent for ensuring ability to achieve and maintain safe shutdown in the event of a fire.
-
- NO NEED FOR EQUIPMENT SPECIFIC ANALYSIS.

N. CLOSING REMARKS

- USE OF FIRE WATCHES IS ACCEPTED.
- TVA REVISED FIRE PROTECTION PROGRAM IN ACCORDANCE WITH LICENSE CONDITION AND 10 CFR 50.59
- NOT REPORTABLE PER 10 CFR 50.72 OR 50.73.
- UNDERSTAND CONCERNS ABOUT PROGRAMMATIC ADDITION OF COMPENSATORY ACTION FLEXIBILITY.
- ACTIONS TAKEN BY TVA CONSISTENT WITH INDUSTRY PRACTICE.



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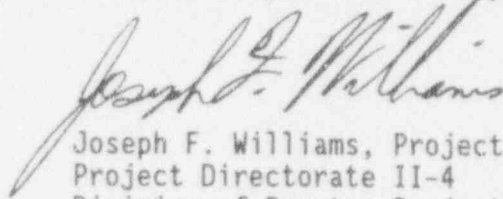
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