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

OCT 28 1982

Mr. Hugh G. Parris
 Manager of Power
 Tennessee Valley Authority
 500A Chestnut Street, Tower II
 Chattanooga, Tennessee 37401

Dear Mr. Parris:

Subject: NUREG-0737 Action Item II.K.3.27 (Common Reference Level)

Re: Browns Ferry Nuclear Plant, Units 1, 2 and 3

By letter dated October 23, 1981 we advised you that we considered your modification resulting from the subject action item to be acceptable as an interim measure only, and that it did not completely resolve the concern upon which the action item is based. We requested you to provide certain commitments and information that we deemed necessary to resolve this concern for your facility. By letter dated January 19, 1982 you responded that you considered no further changes to be necessary, and, thus, you provided neither the commitments nor the information that we requested. Your January 19, 1982 letter also did not provide any information which could lead us to conclude that your existing configuration meets the criteria of the subject item or provides an equivalent configuration.

Since that time, an alternate approach has been developed which we consider to be an acceptable method for resolving this issue. The alternate approach is to incorporate the requirements of Action Item II.K.3.27 into the control room design review to be performed per NUREG-0737 Action Item I.D.1. One advantage of this approach is that it eliminates the possibility of changing water level instrument scales twice; once per Item II.K.3.27 and then possibly again per Item I.D.1. If you should decide to adopt this approach, then we request that you so advise us within 30 days of receipt of this letter. Such a commitment in conjunction with your interim approach would provide sufficient bases for considering Item II.K.3.27 complete for your facility.

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Mr. Hugh G. Parris

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If you decide not to incorporate Item II.K.3.27 into Item I.D.1, then we request that you submit the following information and commitments within 60 days of receipt of this letter:

1. Your commitment to install a modification that provides a common reference level;
2. A description of that modification, including proposed implementation schedules;
3. Your commitment to modify documentation, including operating procedures and Technical Specifications, as required, to reflect the new reference level, and;
4. Your commitment to provide appropriate training for plant operators.

This request for information was approved by the Office of Management and Budget under clearance number 3150-0065 which expires May 31, 1983. Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management Room 3208, New Executive Office Building, Washington, D. C. 20503.

Sincerely,

ORIGINAL SIGNED BY

Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

cc:
See next page

OFFICE ▶	ORB#2:DL	ORB#2:DL	ORB#2:DL	C-ORB#2:DL			
SURNAME ▶	SNoPrris	RClark	JVan Vliet	DVassallo			
DATE ▶	10/28/82	10/23/82:cb	10/28/82	10/28/82			

Mr. Hugh G. Parris

cc:

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