

TENNESSEE VALLEY AUTHORITY

JAN 09 1991

6N Lookout Place

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) - PLANS FOR THE RETURN TO SERVICE OF BFN UNITS 1 AND 3

This letter submits TVA's plan for achieving the restart of BFN Units 1 and 3. By letter dated September 17, 1985, the NRC requested, pursuant to 10 CFR 50.54(f), that TVA specify the corrective actions which would be completed prior to the restart of any of the TVA operating facilities and a schedule for longer term actions. TVA responded for the Browns Ferry Nuclear Plant with the submittal and subsequent revisions to the Corporate Nuclear Performance Plan (CNPP) and Browns Ferry Nuclear Performance Plan (BFNPP). NRC review of these plans is documented in Volumes 1 and 3 of NUREG-1232.

Section 1.0 of the BFNPP states that the CNPP and the BFNPP provided a complete account of TVA's actions to improve its nuclear program for BFN and that these volumes served as the basis for the restart of BFN. It further states that although many of the programs associated with Unit 2 restart have applicability to Units 1 and 3, the BFNPP was specifically directed to Unit 2. TVA considers the issues raised by the NRC's September 17, 1985 letter resolved by the implementation of the CNPP and BFNPP for Unit 2. Accordingly, as previously discussed with NRC, TVA will submit a summary of the Browns Ferry specific actions taken in response to the NRC's September 17, 1985 request. This submittal will be submitted prior to Unit 2 restart. Programs and commitments contained in the BFNPP, including those applicable to Units 1 and 3, will be tracked to completion as part of TVA's normal commitment tracking system.

Section 1.0 of the BFNPP also stated that an evaluation of the programs described in the BFNPP would be performed to determine applicability to Units 1 and 3. This evaluation has been performed and is documented in the Integrated Restart Action Plan. TVA's plans for restart of Units 1 and 3 are based on the requirements for restart of Unit 2. The restart effort for Units 1 and 3 will also take advantage of the extensive discovery efforts expended on BFN Unit 2.

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Enclosures 1 through 4 of this letter address the BFNPP programs which are applicable to the restart of Units 1 and 3. Enclosure 1 lists the BFNPP special programs which are considered complete for Units 1 and 3. No further action on these programs is required.

Enclosure 2 lists the BFNPP special programs which will be implemented on Units 1 and 3 in accordance with the Unit 2 criteria and implementation precedents. The implementation precedent is defined as the general technical approach and methodologies used to implement the program. The documentation compiled during the implementation of the program may, in some cases, be of a different format or may contain a different level of detail than that which was reviewed during the Unit 2 implementation inspections or discussed in previous Unit 2 submittals.

Enclosure 3 lists the BFNPP special programs that will take advantage of the lessons learned from Unit 2. Dates are provided for informational submittals to NRC which will define the alternate methods for achieving the Unit 2 criteria on Units 1 and 3.

Enclosure 4 lists the BFNPP special programs for which TVA will propose criteria which are different from the Unit 2 precedent. Dates are provided for these programmatic submittals. TVA will request timely review and approval of these programs. The Unit 2 design upgrades which are being implemented during this outage are being or have been incorporated in the Updated Browns Ferry Final Safety Analysis Report (UFSAR). Proposed changes to the plant as part of the Units 1 and 3 restart effort which are different than those described in the UFSAR or to the procedures discussed therein, will be evaluated in accordance with the requirements of 10 CFR 50.59.

Enclosure 5 provides a summary of previous commitments or regulatory issues which will be resolved prior to the restart of Units 1 and 3. This list includes NUREG-0737 Action Items, Bulletins, Generic Letters, Unresolved Safety Issues, Generic Safety Issues, Multi-Plant Action Items, and other regulatory requirements. It does not include commitments made in Licensee Event Reports or Notice of Violation responses. New Generic Letters, Bulletins, and regulatory requirements will be resolved on Units 1 and 3 in accordance with their generic scheduler requirements. However, consideration will be given to expedited completion of long lead time issues identified early in the Units 1 and 3 restart process. Newly identified issues will be addressed and scheduled on a case by case basis.

TVA plans to convert the custom Browns Ferry Technical Specifications to the Improved BWR Technical Specifications (ITS) prior to the restart of Units 1 and 3. Implementation of the ITS will be coordinated with unit 2 Technical Specification activities and operational cycles. Development and NRC approval of the ITS will require considerable TVA and NRC resources.

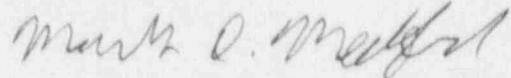
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A summary list of commitments contained in this letter is provided in Enclosure 6. If you have any questions, please contact Joseph E. McCarthy, Unit 3 Licensing Manager, at (205) 729-3604.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



Mark O. Medford, Vice President,
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Enclosures

cc: See page 4

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cc (Enclosures):

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ENCLOSURE 1
BROWNS FERRY NUCLEAR PLANT
NUCLEAR PERFORMANCE PLAN PROGRAMS
WHICH HAVE BEEN COMPLETED ON UNITS 1, 2, AND 3

Secondary Containment Penetrations -

The secondary containment penetrations program was discussed in Section III.3.11 of the BFNPP. Additional information was provided by letters, dated March 16, 1988 and March 23, 1988. This program was evaluated as documented in the NRC's April 11, 1988 Safety Evaluation. Notification of the completion of this program was provided by TVA letter dated October 6, 1989.

Welding -

The welding program was discussed in Section III.6.0 of the BFNPP. Additional information was provided by letter, dated January 18, 1989. This program was evaluated as documented in Section 3.5 of NUREG-1232, Volume 3, Supplement 1, which was issued October 24, 1989. Implementation was verified as documented in Inspection Reports 87-19, dated June 17, 1987 and Report 88-13, dated October 3, 1988.

Wall Thinning Assessment Program (Pipe Erosion/Corrosion) -

The wall thinning assessment program was discussed in Section III.10.0 of the BFNPP. BFN's response to Bulletin 87-01 was provided on September 18, 1987. This program was evaluated as documented in the NRC's August 31, 1988 Safety Evaluation and as documented in Section 3.10 of NUREG-1232, Volume 3, which was issued April 14, 1989 and in Section 3.10 of NUREG-1232, Supplement 1.

Heat Code Traceability -

The heat code traceability program was discussed in Section III.14.5 of the BFNPP. TVA transmitted a generic report on January 4, 1988 which provided the results of the investigations performed on the heat code traceability issue for all of TVA's nuclear plants. By letter dated June 29, 1989, TVA informed the NRC that this report was considered the final resolution of this issue. This program was evaluated as documented in Section 2.3 of NUREG-1232, Supplement 1, and in the May 31, 1990 Safety Evaluation on the TVA Employee Concerns Subcategory Reports.

ENCLOSURE 2
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 PROGRAMS TO BE IMPLEMENTED
IN ACCORDANCE WITH THE UNIT 2 PRECEDENT

Listed below are programs for Units 1 and 3 which will be implemented in accordance with the Unit 2 criteria and implementation precedent. The implementation precedent is defined as the general technical approach and methodologies used to implement the program. The documentation used during the implementation of the program may, in some cases, be of a different format or may contain a different level of detail than that which was reviewed during the Unit 2 implementation inspections or discussed in previous Unit 2 submittals.

There are no open criteria issues with the NRC staff for Unit 2 restart. Physical implementation of the criteria on Unit 2 is not complete in some cases.

Environmental Qualification -

TVA's program for the environmental qualification of electrical equipment was discussed in Section III.1.0 of the Browns Ferry Nuclear Performance Plan (BFNPP). This program was evaluated as documented in the NRC's October 21, 1988 Safety Evaluation, Section 3.2 of NUREG-1232, Volume 3, which was issued April 14, 1989 (Reference 1), and in Section 3.2 of NUREG-1232, Volume 3, Supplement 1, which was issued October 24, 1989 (Reference 2). Implementation was reviewed as documented in Inspection Report 88-11, dated September 1, 1988.

Large Bore Piping and Supports (Bulletins 79-02 and 79-14) -

TVA's program for seismic qualification of large bore piping and supports was described in Section III.3.2 of the BFNPP. The program was addressed by TVA letters dated April 8, 1987, September 28, 1988, November 10, 1988, June 16, 1989, and two letters on March 16, 1990. Implementation was verified as documented in Inspection Reports 89-15, dated May 18, 1989, Report 89-36, dated September 21, 1989, Report 89-44, dated December 11, 1989, Report 89-57, dated January 30, 1990, Report 90-09, dated April 26, 1990, and Report 90-19, dated July 13, 1990.

ENCLOSURE 2 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 PROGRAMS TO BE IMPLEMENTED
IN ACCORDANCE WITH THE UNIT 2 PRECEDENT

HVAC Duct Supports -

TVA's program for seismic qualification of HVAC duct supports was originally described in Section III.3.5 of the BFNPP. The program was addressed by TVA letters dated April 8, 1987, March 10, 1988, and May 26, 1988. The issue of buckling of HVAC ductwork was closed in Inspection Report 89-42, dated February 26, 1990. The issue of modeling of HVAC supports was closed in Inspection Report 89-29, dated September 20, 1989. The issue of welding allowables for HVAC supports was closed in Inspection Report 88-38, dated April 19, 1989. The Safety Evaluations regarding HVAC ductwork and supports were included in the NRC's July 26, 1988 and August 22, 1990 letters.

Control Rod Drive (CRD) Insert and Withdrawal Piping -

TVA's program for seismic qualification of CRD insert and withdrawal piping and supports was originally described in Section III.3.6 of the BFNPP. The revised program for the seismic qualification of this piping was submitted by TVA letters, dated March 17, 1988, June 13, 1989, October 6, 1989, November 27, 1989, December 11, 1989, and January 22, 1990. Implementation was verified as documented in Inspection Reports 89-15, dated May 18, 1989, Report 89-36, dated September 21, 1989, Report 89-39, dated October 13, 1989, Report 89-44, dated December 11, 1989, and Report 89-62, dated February 16, 1990.

Upper Drywell Platforms -

TVA's program for seismic qualification of the upper drywell platforms was described in Section III.3.8 of the BFNPP and in TVA letter dated May 26, 1988. The interim operability criteria were reviewed as documented in the NRC's July 26, 1988 Safety Evaluation. Implementation was verified as documented in Inspection Reports 88-38, dated April 19, 1989, Report 89-29, dated September 20, 1989, Report 89-32, dated November 8, 1989, and Report 89-42, dated February 26, 1990.

ENCLOSURE 2 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 PROGRAMS TO BE IMPLEMENTED
IN ACCORDANCE WITH THE UNIT 2 PRECEDENT

Miscellaneous Steel Frames -

TVA's program for seismic qualification of miscellaneous steel frames was originally described in Section III.3.9 of the BFNPP and in TVA letter dated May 16, 1988. The interim operability criteria was reviewed as documented in the NRC's July 26, 1988 Safety Evaluation. Implementation was verified as documented in Inspection Reports 88-38, dated April 19, 1989, Report 89-29, dated September 20, 1989, Report 89-32, dated November 8, 1989, and Report 89-42, dated February 26, 1990.

Seismic Class II Over Class I / Spacial System Interactions -

TVA's program for Class II Over Class I and spacial system interactions was originally described in Section III.3.10 of the BFNPP and in TVA letter dated March 29, 1988. This program was evaluated as documented in Section 2.2.4.2 of Reference 2.

Design Calculations Review -

TVA's program for design calculations review was discussed in Section III.4.0 of the BFNPP. Revision 4 of the DBVP, which was submitted by TVA letter, dated March 25, 1988, incorporated the design calculation effort. This program was evaluated as documented in the NRC's December 8, 1988 Safety Evaluation. Further discussion is also included in Section 2.1 of References 1 and 2.

Intergranular Stress Corrosion Cracking (IGSCC) -

TVA's program for the resolution of the IGSCC issue was discussed in Section III.7.0 of the BFNPP. Information was also provided by TVA letters, dated August 1, 1988, January 12, 1989, May 22, 1989, June 30, 1989, and July 13, 1990. This program was approved as discussed in Section 3.6 of Reference 1 and NRC letters, dated December 30, 1988 and December 21, 1989. Compliance was reviewed as documented in Inspection Report 89-05, dated March 1, 1989.

ENCLOSURE 2 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 PROGRAMS TO BE IMPLEMENTED
IN ACCORDANCE WITH THE UNIT 2 PRECEDENT

Probabilistic Risk Assessment -

TVA's program for the resolution of the probabilistic risk assessment issue was discussed in Section III.11.0 of the BFNPP. This program and the actions taken to resolve restart concerns was discussed in Section 3.9 of Reference 2. The program discussed in the BFNPP was subsequently superseded by TVA letter dated October 30, 1989, which proposed TVA's program for responding to Generic Letter 88-20, Individual Plant Examination for Severe Accident Vulnerabilities. TVA proposed to resolve this issue in accordance with the approach, methodology, and schedule contained in Generic Letter 88-20 and its supplements. The proposed approach and methodology were determined to be acceptable as documented by NRC letter dated January 12, 1990.

Component and Piece Part Qualification -

TVA's program for the resolution of the component and piece part qualification issue was discussed in Section III.11.0 of the BFNPP. This program was evaluated as documented in the NRC's January 10, 1990 Safety Evaluation.

Cable Ampacity -

TVA's program for the resolution of the ampacity issue was discussed in Section III.13.2 of the BFNPP. TVA submitted additional information by letters dated January 25, 1988, July 7, 1988, September 30, 1988, February 21, 1989, March 17, 1989, April 18, 1989, April 27, 1989, July 7, 1989, October 6, 1989, April 9, 1990, and May 21, 1990. The NRC Safety Evaluation was issued by letter, dated December 19, 1989. Compliance was reviewed as documented in Inspection Reports 89-59, dated April 9, 1990 and Report 90-13, dated August 10, 1990.

Flexible Conduits -

The issue of flexible conduits was discussed in Section III.13.3 of the BFNPP. TVA's program for the resolution of this issue was submitted by TVA letter, dated August 18, 1989. The NRC requested additional information by letter dated December 19, 1990. TVA responded by letter dated March 2, 1990.

ENCLOSURE 2 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 PROGRAMS TO BE IMPLEMENTED
IN ACCORDANCE WITH THE UNIT 2 PRECEDENT

Thermal Overloads -

TVA's program for the resolution of the thermal overloads issue was discussed in Section III.13.4 of the BFNPP. Additional information was provided by TVA letter, dated April 28, 1988. The NRC requested additional information by letter, dated August 10, 1988. TVA responded by letters, dated September 21, 1988, February 28, 1989, and May 15, 1989. This program was evaluated as documented in Section 3.11 of References 1 and 2. Compliance was reviewed as documented in Inspection Report 89-59, dated February 23, 1990.

Splices -

TVA's program for the resolution of the splice issue was discussed in TVA letter, dated April 28, 1988, and in Section III.13.5 of the BFNPP.

Fuses -

TVA's program for the resolution of the fuse issue was discussed in Section III.13.6 of the BFNPP. Additional information was provided by TVA letters, dated April 28, 1988 and April 9, 1990. The NRC requested additional information by letter, dated August 10, 1988. TVA responded by letter dated September 21, 1988. This program was approved in Section 3.11 of Reference 2. Compliance was reviewed as documented in Inspection Reports 89-95, dated February 23, 1990 and Report 90-13, dated August 10, 1990.

Q-List -

TVA's program for the development of a Q-list was discussed in Section III.14.1 of the BFNPP. This program will be fully implemented prior to the restart of Units 1 and 3.

Moderate Energy Line Break (MELB) -

TVA's program for the resolution of the MELB issue was discussed in Section III.14.2 of the BFNPP. The MELB analysis was provided by TVA letters, dated September 23, 1988, November 29, 1988, and March 24, 1989. This program was approved in Section 3.8 of Reference 2.

ENCLOSURE 2 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 PROGRAMS TO BE IMPLEMENTED
IN ACCORDANCE WITH THE UNIT 2 PRECEDENT

Containment Coatings -

TVA's program for the resolution of the containment coatings issue was discussed in Section III.14.3 of the BFNPP. The results of the review of unqualified coatings was submitted by TVA letter, dated October 4, 1989.

Platform Thermal Growth -

TVA's program for the resolution of the platform thermal growth issue was discussed in Section III.14.4 of the BFNPP. Resolution of the issue of thermal expansion of steel structures inside the drywell is discussed in Inspection Report 50-260/89-29, dated September 20, 1989. Resolution of the issue of thermal expansion of steel structures outside the drywell is discussed in Inspection Report 50-260/89-42, dated February 26, 1990.

ENCLOSURE 3
 BROWNS FERRY NUCLEAR PLANT
 UNITS 1 AND 3 PROGRAMS WHICH WILL DEPART
 FROM THE UNIT 2 IMPLEMENTATION PRECEDENT

Listed below are the Units 1 and 3 programs which will use alternate implementation methods for achieving the criteria established for Unit 2 on Units 1 and 3. Commitment dates are provided for informational submittals to NRC which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.

<u>ISSUE</u>	<u>SUBMITTAL DATE</u>
ELECTRICAL ISSUES:	
Cable Installation (Including Cable Separation) (NPP Section III.13.1)	02/15/91
SEISMIC DESIGN ISSUES:	
Small Bore Piping (NPP Section III.3.7)	03/01/91
Instrument Tubing (NPP Section III.3.7)	03/01/91
Seismic Class II Over I - Water Spray (NPP Section III.3.10)	03/01/91
Cable Tray Supports (NPP Section III.3.3)	03/29/91
Conduit Supports (NPP Section III.3.4)	03/29/91
Long Term Torus Integrity Program (NPP Section III.3.1)	04/15/91
OTHER ISSUES:	
Instrument Sensing Lines (NPP Section III.9.0)	02/15/91
Configuration Management / Design Baseline (NPP Section III.2.0)	06/14/91
Restart Test Program (NPP Section III.8.0)	To Be Scheduled At A Later Date

ENCLOSURE 4
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 PROGRAMS WHICH WILL DEPART
FROM THE UNIT 2 CRITERIA PRECEDENT

Listed below are the Units 1 and 3 programs for which TVA will propose criteria which is different from the Unit 2 precedent. Commitment dates are provided for programmatic submittals to NRC which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and propose the criteria for resolution of the issue on Units 1 and 3.

<u>ISSUE</u>	<u>SUBMITTAL DATE</u>
Drywell Steel Platforms (NPP Section III.3.8)	05/15/91
Fire Protection / 10 CFR 50, Appendix R (NPP Section III.5.0)	To Be Scheduled At A Later Date

ENCLOSURE 5
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 RESTART COMMITMENTS OR REGULATORY ISSUES

The following is a preliminary list of previous commitments or regulatory issues which will be resolved prior to the restart of Units 1 and 3. This includes NUREG-0737 Action Items, Bulletins, Generic Letters, Unresolved Safety Issues, Generic Safety Issues, Multi-Plant Action Items and other regulatory requirements.

NUREG-0737 (TMI Action Plan) Action Items:

Dr. T. Murley's letter of April 14, 1989 requested TVA verify the implementation status of TMI Action Plan Items. TVA's letter of April 18, 1989 provided a "best effort" response in view of the short turnaround time requested and stated that NRC would be apprised of any changes to that list. This commitment was closed by TVA letter, dated June 16, 1989. The following list provides an update to the schedule for completion of outstanding TMI Action Items prior to restart of Units 1 and 3:

- Item I.D.1 - Control Room Design Review (Safety Significant (Category 1 and 2) Human Engineering Deficiencies (HEDs) and those additional HEDs which were required for Unit 2 restart)
- Item I.D.2 - Safety Parameter Display Console
- Item II.B.3 - Post-Accident Sampling System
- Item II.E.4.2.1-4 - Containment Isolation Dependability - Implement Diverse Isolation
- Item II.E.4.2.6 - Containment Isolation Dependability - Containment Purge Valves (Unit 3 Only - Unit 1 Previously Completed)
- Item II.F.1.2.A - Accident - Monitoring - Noble Gas Monitor
- Item II.F.1.2.B - Accident - Monitoring - Iodine/Particulate Monitor
- Item II.F.1.2.C - Accident - Monitoring - Containment High Range Radiation Monitor
- Item II.F.1.2.D - Accident - Monitoring - Containment Pressure (Unit 3 Only - Unit 1 Previously Completed)
- Item II.F.1.2.E - Accident - Monitoring - Containment Water Level (Unit 3 Only - Unit 1 Previously Completed)

ENCLOSURE 5 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 RESTART COMMITMENTS AND REGULATORY ISSUES

NUREG-0737 (TMI Action Plan) Action Items (Continued):

Item II.F.2.4 (Generic Letter 84-23)- Instrumentation for Detection of Inadequate Core Cooling

Item II.K.3.13 - HPCI/RCIC Initiation Levels

Item II.K.3.18 - ADS Actuation Modifications

Item II.K.3.28 - Qualification of ADS Accumulators

Bulletins (B):

TVA has reviewed the Bulletins which were addressed during the current Unit 2 outage. The following list includes those Bulletins which TVA will complete prior to restart of Units 1 and 3:

B 79-02 - Pipe Support Base Plate Designs Using Concrete Expansion Anchor Bolts

B 79-12 - Short Period Scrams at BWR Facilities

B 79-14 - Seismic Analysis for As-Built Safety-Related Piping Systems

B 79-18 - Audibility Problems

B 80-06 - Engineered Safety Feature (ESF) Reset Controls

B 83-06 - Electrical Circuit Breakers with an Undervoltage Trip Feature in use in Safety-Related Applications other than the Reactor Trip System

B 84-02 - Failures of General Electric Type HFA Relays in Use in Class 1E Safety Systems

B 86-02 - Static "O" Ring Differential Pressure Switches

B 88-03 - Inadequate Latch Engagement in HFA Type Relays Manufactured by General Electric Company

B 88-07 - Power Oscillations in Boiling Water Reactors

B 90-01 - Loss of Fill Oil in Rosemount Transmitters

ENCLOSURE 5 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 RESTART COMMITMENTS OR REGULATORY ISSUES

Generic Letters (GL):

TVA has reviewed the Generic Letters which were addressed during the current Unit 2 outage. The following list includes those Generic Letters which TVA will complete prior to restart of Units 1 and 3 :

- GL 82-33 - Instrumentation to Follow the Course of an Accident - Regulatory Guide 1.97 (With the exception of qualified neutron monitoring instrumentation.)
- GL 83-08 - Modification of Vacuum Breakers on Mark I Containments (Open on Unit 1 only)
- GL 83-28 - Salem ATWS
- GL 83-36 - NUREG-0737 Technical Specifications
- GL 88-01 - NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping
- GL 88-11 - Radiation Embrittlement of Reactor Vessel Materials and its Impact on Plant Operations
- GL 88-14 - Instrument Air Supply System Problems Affecting Safety-Related Equipment
- GL 88-20 - Initiation of the Individual Plant Examination for Severe Accident Vulnerabilities
- GL 89-06 - Safety Parameter Display System - 10 CFR 50.54(f)
- GL 89-10 - Safety-Related Motor-Operated Valve Testing and Surveillance
- GL 89-13 - Service Water Systems Problems Affecting Safety-Related Equipment
- GL 89-16 - Installation of a Hardened Wetwell Vent
- GL 89-19 - Request for Action Related to Resolution of Unresolved Safety Issue A-47, "Safety Implication of Control Systems in LWR Nuclear Power Plants", Pursuant to 10 CFR 50.54(f)

ENCLOSURE 5 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 RESTART COMMITMENTS OR REGULATORY ISSUES

Unresolved Safety Issues (USIs) [Associated Multi-Plant Action Item (MPA)]:

Generic Letter 89-21, dated October 19, 1989, requested information concerning the status of the implementation of USI requirements. TVA responded by letter dated November 15, 1989. The following list of USIs which TVA will complete prior to restart of Units 1 and 3 reflects that submittal:

USI A-7 (MPA D-01) - Mark I Long-Term Program

USI A-9 - Anticipated Transients Without Scram [10 CFR 50.62]

USI A-24 (MPA B-60) - Qualification of Class IE Safety-Related Equipment

USI A-36 (MPA C-10) - Control of Heavy Loads Near Spent Fuel Pool

USI A-42 (MPA B-05) - Pipe Cracks in Boiling Water Reactors

USI A-44 - Station Blackout [10 CFR 50.63]

USI A-48 (MPA A-19) - Hydrogen Control Measures and Effects of Hydrogen Burns

Generic Safety Issues (GSIs) [Associated Multi-Plant Action Item (MPA)]:

Generic Letter 90-04, dated April 25, 1990, requested information concerning the status of the implementation of GSIs which were resolved with imposition of requirements or corrective actions. TVA responded by letter dated May 30, 1990. The NRC staff's understanding of the status of these issues was documented by letter dated November 7, 1990. The following list of GSIs which TVA will complete prior to restart of Units 1 and 3 reflects that submittal:

GSI 40 (MPA B-065) - Safety Concerns Associated with Pipe Breaks in the BWR Scram System

GSI 41 (MPA B-058) - BWR Scram Discharge Volume System

GSI 43 (MPA B-107) - Reliability of Air Systems

GSI 51 (MPA L-913) - Improving the Reliability of Open-Cycle Service Water Systems

ENCLOSURE 5 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
UNITS 1 AND 3 RESTART COMMITMENTS OR REGULATORY ISSUES

Multi-Plant Action Items (Not Previously Listed):

NRC letter dated June 22, 1987, requested TVA verify the data contained in the NRC SIMS tracking system for BFN. TVA responded by letter dated September 2, 1988 and through subsequent discussions with the NRC Project Manager and correspondence on individual issues. The following is a list of MPAs which TVA will complete prior to restart of Units 1 and 3:

MPA A-01 - 10 CFR 50.55A(G) - Inservice Inspection

MPA A-04 - 10 CFR 50, Appendix J - Containment Leak Testing

MPA B-41 - 10 CFR 50, Appendix R - Fire Protection

MPA C-10 - Control of Heavy Loads - Phase I (NUREG-0612)

Other Programs:

The following regulatory requirement will also be completed prior to the restart of Units 1 and 3:

10 CFR 50.45(B)(2)(III) - Plant Simulator

ENCLOSURE 6
BROWNS FERRY NUCLEAR PLANT
SUMMARY OF COMMITMENTS

- 1) TVA will issue a cable installation (including cable separation) submittal by February 15, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 2) TVA will issue an instrument sensing lines submittal by February 15, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 3) TVA will issue a Seismic Class II over I - water spray submittal by March 1, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 4) TVA will issue a small bore piping submittal by March 1, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 5) TVA will issue an instrument tubing submittal by March 1, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 6) TVA will issue a cable tray supports submittal by March 29, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 7) TVA will issue a conduit supports submittal by March 29, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 8) TVA will issue a long term torus integrity program submittal by April 15, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 9) TVA will issue a drywell platforms submittal by May 15, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and propose the criteria for resolution of the issue on Units 1 and 3.
- 10) TVA will issue a configuration management / design baseline program submittal by June 14, 1991 which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.

ENCLOSURE 6 (CONTINUED)
BROWNS FERRY NUCLEAR PLANT
SUMMARY OF COMMITMENTS

- 11) TVA will issue a fire protection / 10 CFR 50, Appendix R submittal on a date to be scheduled later which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and propose the criteria for resolution of the issue on Units 1 and 3.
- 12) TVA will issue a restart test program submittal on a date to be scheduled later which will summarize the issue, review the Unit 2 resolution, discuss lessons learned, and describe how the issue will be resolved on Units 1 and 3.
- 13) TVA will complete NUREG-0737, Item I.D.1 - Control Room Design Review, Safety Significant Human Engineering Deficiencies and those HEDs required for Unit 2 restart prior to the restart of Units 1 and 3.