

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

May 20, 1994

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

> Mr. Oliver D. Kingsley, Jr. President, TVA Nuclear and Chief Nuclear Officer Tennessee Valley Authority 6A Lookout Place 1101 Market Street Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING AMENDMENTS 9 AND 10 OF THE UPDATED FINAL SAFETY ANALYSIS REPORT FOR THE BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3 (TAC NOS. M84110, M84111, M84112, M87275, M87276, AND M87277)

INTRODUCTION

By letters dated July 22, 1992 and July 22, 1993, the Tennessee Valley Authority (TVA) provided Amendments 9 and 10, respectively, to the Updated Final Safety Analysis Report (UFSAR) for the Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3. During its review of these amendments, the NRC staff has identified topics for which additional information is required. These topics and the information requested are described below.

REACTOR CORE ISOLATION COOLING RECLASSIFICATION

The staff noted in its review of UFSAR Amendment 9 that TVA has classified certain functions of the reactor core isolation cooling (RCIC) system as "cuality related" vs. safety-related. Associated with this reclassification, the staff requests that TVA address the following issues:

- Describe the meaning and significance of the "quality related" classification.
- 2. Will the RCIC system be subject to quality assurance standards consistent with 10 CFR 50, Appendix B?
- 3. How will high reliability of the RCIC system be assured?
- Certify that no credit is taken for RCIC system performance in accident analyses, including station blackout (SBO) and anticipated transient without scram (ATWS).

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Mr. Oliver D. Kingsley

- 5. Discuss how the change in RCIC system classification affects inservice inspection and testing requirements for this system.
- 6. Will the RCIC system remain part of emergency operating procedures?

INCORPORATION OF SAFETY ANALYSES REQUESTED BY THE NRC - 10 CFR 50.71(e)

Requirements for periodic revision of the UFSAR are described in 10 CFR 50.71(e). This regulation states, in part:

This submittal shall contain all the changes necessary to reflect information and analyses submitted to the Commission by the licensee or prepared by the licensee pursuant to Commission requirements since the submittal of the original FSAR or, as appropriate, the last updated FSAR. The updated FSAR shall be revised to include the effects of: ... all analyses of new safety issues performed by or on behalf of the licensee at Commission request.

The staff notes that the BFN UFSAR does not presently include any discussion which describes how BFN conforms to the requirements of the regulations relevant to the ATWS or SBO (10 CFR 50.62 and 10 CFR 50.63, respectively). Consistent with the requirements of 10 CFR 50.71(e), TVA should revise the BFN UFSAR to address SBO and ATWS analyses. TVA should also consider whether the UFSAR should include other analyses, such as items addressed in the Nuclear Performance Plan, which was provided in response to the staff's letter of September 17, 1985. The staff requests that this revision be completed no later than the submission of UFSAR Amendment 12.

Please contact me at (301) 504-1470 if you have any questions regarding this request. This request affects nine or fewer respondents, and therefore is not subject to Office of Management and Budget review under P.L. 56-911.

Sincerely,

Original signed by

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

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