TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

December 3, 1982

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Denton:

| In the Matter of the |) | Docket Nos | . 50-259 |
|----------------------------|---|------------|----------|
| Tennessee Valley Authority |) | | 50-260 |
| | | | 50-296 |

By letter from D. B. Vassallo to H. G. Parris dated October 28, 1982, we were requested to provide information regarding proposed resolution of NUREG-0737, Item II.K.3.27 (Common Reference Level) for the Browns Ferry Nuclear Plant. In accordance with the alternate approach outlined in that letter we will be reviewing item II.K.3.27 in conjunction with the control room design review (CRDR) as required by item I.D.1. The recommendations made by our multi-disciplinary and human factors CRDR assessment team will be considered by TVA as the final resolution. Modifications identified by the review team, if any, will be performed on the schedule specified in the resolution of item I.D.1.

We would like to point out our belief that we have been both responsive and open in the past regarding this matter. In T. A. Ippolito's letter to H. G. Parris dated October 23, 1981 additional commitments were requested to resolve item II.K.3.27. In our response dated January 19, 1982 we provided an explanation of and justification for our position (including human factors considerations). In addition, numerous conference calls were held with your staff between October 23, 1981 and January 17, 1982 to help ensure that our response would be adequate.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

A046

L. M. Mills, Manager Nuclear Licensing

Subscribed and sworn to before me this 312 day of All. 1982. Notary Public

My Commission Expires

cc: See page 2

December 3, 1982

Mr. Harold R. Denton

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cc: U.S. Nuclear Regulatory Commission Region II ATTN: James P. O'Reilly, Regional Administrator 101 Marietta Street, Suite 3100 Atlanta, Georgia 30303

Mr. R. J. Clark Browns Ferry Project Manager U.S. Nuclear Regulatory Commission 7920 Norfolk Avenue Bethesda, Maryland 20814