TENNESSEE VALLEY AUTHORITY
CHATTANOOGA, TENNESSEE 37401

5B Lookout Place

JAN 17 1991

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

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

BROWNS FERRY NUCLEAR PLANT (BFN) - DECLARATION OF READINESS FOR OPERATIONAL READINESS ASSESSMENT TEAM (ORAT) INSPECTION

Reference: Letter from B. A. Wilson to O. D. Kingsley, Jr. dated June 29, 1990, "Browns Ferry Operational Readiness Assessment Team Inspection Prerequisites"

In the reference letter NRC provided the prerequisites which should be satisfied prior to the ORAT inspection. We have considered each prerequisite, and based on our current schedule, BFN will be ready for the ORAT inspection on February 11, 1991.

The status of each prerequisite is summarized below along with a brief description of the manner by which it will or has been fulfilled.

1. Declaration by TVA that the facility is ready for the NRC ORAT.

   STATUS: BFN will be ready for this inspection on February 11, 1991.

2. Issuance of the TVA Phase 3 Operation Readiness Review (ORR) report.

   STATUS: This prerequisite was satisfied by the issue of the TVA ORR team's report on March 9, 1990. This report provided the results of the team's comprehensive review of BFN's operational readiness conducted over a four-week period. The ORR team concluded that, with the programmatic control systems in place and subject to satisfactory resolution of identified and emergent items, BFN can safely resume nuclear operations. BFN responded to the items identified in this report on September 28, 1990.

   The ORR team recommended an additional short independent review of operations and work control at a time closer to Unit 2 restart when the facility's environment will lend itself to a better evaluation of the effectiveness of these activities. This assessment began on January 3, 1991. TVA expects the team to issue its report no later than February 1, 1991.

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3. Essentially all safety-related modifications are complete and plant systems and areas are under operational control.

   STATUS: The safety-related modifications program is essentially complete. Safety-related modifications are completed as each system is returned to service.

4. Completion of 75 percent of the surveillance tests required for startup and identification of outstanding tests.

   STATUS: Surveillance testing is progressing at a rate determined by the schedule for the return of plant systems to operable status. This schedule is projecting that 75 percent of the surveillance tests required for startup will be completed by February 11, 1991.

5. Resolution of essentially all drawing deficiencies for primary and critical drawings.

   STATUS: TVA considers this prerequisite complete. Drawing deficiencies are being resolved as plant systems are returned to service.

6. Issuance of essentially all procedure upgrades necessary for restart.

   STATUS: This prerequisite is complete. BFN procedures required for restart have been upgraded.

7. Completion of the restart te. program and resolution of essentially all test deficiencies for safety-related systems required to support initial criticality.

   STATUS: The restart test program is essentially complete. Approximately twenty restart test exceptions and six restart tests on safety-related systems are scheduled to be completed prior to criticality. Nine restart tests will be continued into the power ascension test program. These tests have not been completed because the required plant conditions will not be available until the power ascension test program is begun. All of these tests are safety-related.

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8. At the beginning of the inspection, the licensee should have available for the inspection team:

   a. The status of system line-ups to support plant startup.

   b. A list of activities required prior to exceeding each TVA management holdpoint.

   c. The status of any testing other than surveillance or restart testing.

   d. The status of licensed operator staffing and training.

   The requested information will be available for the inspection team at the beginning of the inspection.

TVA expects the current restart schedule to support the completion of the ORAT inspection prerequisites as described herein; however, we will keep NRC informed of the current status of each item through periodic telephone communications with Dr. Peter S. Koltay, NRR.

If you have any questions, please telephone Patrick P. Carier at BFN, 205/729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

Marky Burzynski for
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cc: See page 3

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