

Tennessee Valley Authority Post Office Box 2000, Decate: Abibarria, 35609

O. J. 'Ike' Zeringue Vice Prevident, Browns Ferry Operations

OCT 1 7 1999

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

Gentlemen:

In the Matter of Tennessee Valley Authority

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

BROWNS FERRY NUCLEAR PLANT (BFN) - SUPPLEMENTAL REPLY TO NOTICE OF VIOLATION (NOV) 87-33-01

TVA is issuing this letter to document a change in a commitment made to NRC in the October 6, 1988 response to the NOV.

In the NOV, NRC cited TVA for failure to comply with 10 CFR 50, Appendix B, Criterion V when plant drawing requirements were not met for waterproofing and sealing of electrical conduits. In the response to the NOV, TVA committed to the following: Conduits in the Unit 2 Reactor Building (RB) and the two areas that will still have open head deluge type fire protection valves will be sealed in accordance with drawing requirements before Unit 2 restart.

TVA reviewed the scope of the work required to meet this commitment and determined it was not feasible to seal all the conduit and junction boxes in the Unit 2 RB. In order to determine which junction boxes and conduits would need sealing, an evaluation of the plant areas subject to moisture intrusion and required to support Unit 2 operation was performed. As a result of the evaluation, TVA identified areas where conduit and junction boxes could be subjected to condensation from high and moderate energy line breaks and from open head fixed water spray fire protection systems.

IEO

U.S. Nuclear Regulatory Commission

## OCT 17 1998

TVA discussed the technical merits of this commitment change with the NRC resident's staff prior to the restart of Unit 2. The residents staff concurred with the validity of the new approach and closed this NOV in Inspection Report 91-16.

If you have any questions concerning this supplemental reply to the NOV, please telephone Patrick P. Carier at (205) 729-7570.

Sincerely,

O. J. Zeringue

cc: NRC Resident Inspector Browns Ferry Nuclear Plant Route 12, Box 637 Athens, Alabama 35609-2000

> Mr. Thierry M. Ross, Project Manager U.S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

Mr. B. A. Wilson, Project Chief U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323