

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

February 10, 1992

Docket Nos. 50-259 and 50-296

> Mr. Dan A. Nauman Senior Vice President, Nuclear Power Tennessee Valley Authority 5N 38A Lookout Place 1101 Market Place Chattanooga, Tennessee 37402-2801

Dear Mr. Nauman:

SUBJECT:

EVALUATION OF LONG-TERM TORUS INTEGRITY PROGRAM FOR BROWNS FERRY NUCLEAR PLANT, UNITS 1 AND 3 (TAC NOS. M80685 AND M80686)

- References: 1. E.G. Wallace to U.S. Nuclear Regulatory Commission, "BROWNS FERRY NUCLEAR PLANT (BFN) - PROGRAM FOR RESOLVING LONG-TERM TORUS INTEGRITY ISSUE PRIOR TO THE RESTART OF UNITS 1 AND 3," letter dated April 29, 1991.
 - 2. Domenic B. Vassallo to Hugh G. Parris, "MARK I CONTAINMENT LONG TERM PROGRAM," letter dated May 6, 1985.
 - NUREG-1232, Volume 3, Supplement 2, "Safety Evaluation Report on Tennessee Valley Authority: Browns Ferry Nuclear Performance Plan, " January, 1991.

In Reference 1, the Tennessee Valley Authority (TVA) submitted their proposed program to assure long-term integrity of the primary containment torus for Browns Ferry Units 1 and 3. The NRC staff has determined that this program does not affect the safety evaluations provided in References 2 and 3. Program implementation on Browns Ferry Units 1 and 3 will be verified by NRC inspection. This conclusion is discussed below.

Based upon its experience during the Browns Ferry Unit 2 recovery, TVA has proposed several changes to the torus inspections planned for Units 1 and 3. These are:

- deletion of four torus and torus-related structure inspection attributes which did not result in modifications on Unit 2.
- no inspections of non-safety related valve access platforms.
- inspections of non-safety related catwalks will be limited to welds and bolted connections associated with maintaining integrity of safety-related structures.

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In 1985, the NRC staff provided its safety evaluation (Reference 2) accepting the long-term torus integrity program for all three Browns Ferry units. The Browns Ferry Unit 2 recovery process did not result in any revision to this evaluation, or the supporting design criteria. Subsequently, in 1991, the staff safety evaluation supporting Unit 2 restart (Reference 3) addressed only torus hardware deficiencies, not torus integrity design criteria previously approved by Reference 2.

Changes in the TVA torus inspection program do not affect the design criteria accepted by Reference 2. The effectiveness of these inspections by TVA to fulfill the conditions assumed by the staff SER (Reference 2) will be verified by the NRC inspection program. Therefore, prior staff approval of TVA's torus inspection program is not required.

TVA has also stated that torus-attached piping discrepancies in Browns Ferry Units 1 and 3 will be resolved in accordance with the Unit 2 criteria and implementation precedent. The Unit 2 program has been previously reviewed and approved by the staff, as documented in Reference 3. Therefore, the staff accepts this program for Units 1 and 3.

Please contact me at (301)504-1470 if you have any questions regarding this issue.

Sincerely,

Original signed by

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

cc: See next page

*SEE PREVIOUS CONCURRENCE

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