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

December 2, 1992

LICENSEE: Tennessee Valley Authority

FACILITY: Browns Ferry Nuclear Plant, Units 1, 2, and 3

SUBJECT: SUMMARY OF A MEETING WITH THE LICENSEE REGARDING EXPANDED

INDIVIDUAL PLANT EXAMINATIONS

On October 15, 1992, representatives of the Tennessee Valley Authority (TVA) met with the NRC staff in Rockville, Maryland, to discuss TVA's plans for conducting an expanded Individual Plant Examination (IPE) for all three units of the Browns Ferry Nuclear Plant (BFN). The principal purpose of this meeting was to brief the staff on how TVA intended to address certain comments raised by the staff at a previous meeting held on May 28, 1993. These comments were subsequently documented in a letter to TVA dated July 22, 1992. This letter also provided the results of the staff's preliminary review of TVA's proposed approach for conducting a multi-unit IPE, as described in their submittal of February 7, 1992. In both the meeting and the July 22, 1992 letter, the staff's comments centered around certain assumptions inherent in TVA's proposed approach, such as: (1) operation of three units represents a bounding plant configuration, (2) ten selected shared systems are sufficient to scope all significant vulnerabilities, and (3) severe accident analysis is limited to two selected initiating events. TVA was requested to provide detailed justifications for these assumptions with their expanded IPE submittal, which is scheduled for the end of 1993.

Meeting attendees are listed in Enclosure 1. A copy of TVA's presentation handouts is provided as Enclosure 2. In general, TVA took this opportunity to discuss with the staff its interpretation of the comments documented in the July 22, 1992 letter and to present its anticipated response to these comments. By the end of the meeting, all parties involved concluded that a sufficient level of mutual understanding had been reached and that TVA appeared to be heading in the right direction.

Original signed by
Frederick J. Hebdon, Project Director
Project Directorate II-4
Division of Reactor Projects - 1/II, NRR

Enclosures:

1. Attendees

2. Agenda

cc w/enclosures: See next page

OFC	PDII-4/LA	PDII-4/PM	PDII-4/PM	PDII-4/PD
NAME	MSandershul	TRoss:dw /	JW1111ams/	FHebdon
DATE	12/1/92	12/2/92	142/92	12/2/92

JE01

Browns Ferry Nuclear Plant

cc: Mr. John B. Waters, Chairman Tennessee Valley Authority ET 12A 400 West Summit Hill Drive Knoxville, Tennessee 37902

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T. Murley/F. Miraglia	12-G-18
J. Partlow	12-G-18
F. Hebdon	
T. Ross	
J. Williams	
OGC	15-B-18
E. Jordan	MNBB-3701
W. Beckner	10-E-4
R. Hernan	14-C-7
ACRS(10)	
L. Plisco	17-G-21
E. Merschoff	RII
D. Wheeler	12-D-22
J. Flack	NLS-324
E. Rodrick	NLS324
J. Schiffgens	10-E-4

ATTENDEES

BROWNS FERRY EXPANDED INDIVIDUAL PLANT EXAMINATION MEETING OCTOBER 15, 1992

Name

Thierry Ross
William Beckner
John Schiffgens
Ron Hernan
Paul (allogg
Duke Wheeler
John Flack
Ed Rodrick
Greg Pierce
Mike Hellums
Henry Jones
Richard McMahon

Organization

NRR/PDII-4
NRR/SPSB
NRR/SPSB
NRR/PDI-4
Region II (Phone conferee)
RES/SAIB
RES/SAIB
TVA/BFN Licensing
TVA/Corporate Licensing
TVA/BFN Engineering
TVA/Corporate PRA

TOPIC	SPOKESMAN	
BACKGROUND	G. D. PIERCE	
MRC COMMENTS (NRC's 7/22/92 LETTER)	H. L. JONES	
RESPONSE TO NRC COMMENTS	H. L. JONES	
CONCLUSTON	G. D. PIERCE	

TOPIC

SPOKESMAN

BACKGROUND

G. D. PIERCE

TOPIC

SPOKESMAN

NRC COMMENTS (NRC's 7/22/92 LETTER)

H. L. JONES

- UNITS 1 AND 3 SUFFICIENTLY SIMILAR TO UNIT 2 SUCH THAT UNIT 2 IPE IS APPLICABLE TO UNITS 1 AND 3
- SIGNIFICANT VULNERABILITIES ENVELOPED BY THE ANALYSIS OF THE TEN SHARED SYSTEMS
 - SYSTEMATIC EVALUATION OF SHARED SYSTEMS AND BASIS FOR ELIMINATION
- ANALYSIS LIMITED TO TWO INITIATING EVENTS
 - BASIS FOR ELIMINATING ANY INITIATORS
- EFFECT OF SHUT DOWN UNITS ON OPERATING UNITS

TOPIC

SPOKESMAN

RESPONSE TO NRC COMMENTS

H. L. JONES

COMMENT: UNITS 1 AND 3 SUFFICIENTLY SIMILAR TO UNIT 2 SUCH THAT UNIT 2 IPE IS APPLICABLE TO UNITS 1 AND 3

- RESPONSE: . ALL THREE UNITS HAVE A HIGH DEGREE OF SIMILARITY AND SHARE A COMMON FSAR
 - OVERALL REGULATORY FRAMEWORK FOR UNITS 1 AND 3 IS BASED ON SIMILARITY IN PLANT CONFIGURATION AND REQUIRED CORRECTIVE ACTIONS
 - DESIGN BASELINE PROGRAM FOR UNITS 1 AND 3 WILL VERIFY CRITERIA ARE ADEQUATE AND PROPERLY IMPLEMENTED PRIOR TO THE RESTART OF EACH UNIT
 - PIFFERENCES BETWEEN UNITS 1 AND 3 SYSTEMS AND SYSTEM MODELS IN THE IPE WILL BE EVALUATED, AND MODELED, IF SIGNIFICANT
 - PROCEDURAL CONTROLS

TOPIC

SPOKESMAN

RESPONSE TO NRC COMMENTS

H. L. JONES

COMMENT: SIGNIFICANT VULNERABILITIES ENVELOPED BY
THE ANALYSIS OF THE TEN SHARED SYSTEMS

(SYSTEMATIC EVALUATION OF ALL SHARED SYSTEMS AND BASIS FOR ELIMINATION)

RESPONSE: • ENCLOSURE 2 TO TVA'S 2/07/92 LETTER:

- PROVIDED CRITERIA USED FOR DESIGN OF SHARED SYSTEMS
- IDENTIFIED SHARED SYSTEMS
- DESCRIBED SHARED FUNCTIONS
- JUSTIFIED THE ELIMINATION OF ANY SHARED SYSTEM
- . TOP SYSTEMS IN UNIT 2 IPE WILL BE MODELED

TOPIC

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RESPONSE TO NRC COMMENTS

H. L. JONES

COMMENT: ANALYSIS LIMITED TO TWO INITIATING EVENTS

(BASIS FOR ELIMINATING ANY INITIATORS)

ONSE: • LOSS OF OFFSITE POWER AND LOSS OF PLANT
AIR CONSIDERED REASONABLE AND
REPRESENTATIVE INITIATING EVENTS

- BOTH EVENTS DIRECTLY RESULT IN THE SHUTDOWN OF ALL THREE UNITS
- LOSS OF OFFSITE POWER WAS LEADING INITIATING EVENT FOR UNIT 2 IPE (69 PERCENT OF CDF)

TOPIC

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RESPONSE TO NRC COMMENTS

H. L. JONES

COMMENT: EFFECT OF SHUT DOWN UNITS ON OPERATING UNITS

RESPONSE: • BFN IPE CONSIDERED EFFECTS OF UNITS 1

AND 3 SHUTDOWN AND UNIT 2 IN OPERATION

TVA'S 2/07/97 LETTER JUSTIFIED THREE UNIT
OPERATION AS MOST LIMITING CASE

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TOPIC

SPOKESMAN

CONCLUSION

G. D. PIERCE

- EVALUATION OF SYSTEMS SHARED BETWEEN UNITS WAS NOT REQUIREMENT OF GENERIC LETTER 88-20
- NUREG-1335 STATES THAT ONLY POWER OPERATION AND HOT STANDBY NEED BE CONSIDERED FOR THE PURPOSES OF THE IPE
- BFN'S PROPOSAL IS PROACTIVE, RESPONSIVE TO NRC COMMENTS, AND IS A GOOD FAITH EFFORT