

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

SEP 15 1988

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

Gentlemen:

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

BROWNS FERRY NUCLEAR PLANT (BFN) - CONTROL ROOM HABITABILITY

The purpose of this letter is to document TVA's understanding of the agreements reached during the August 11, 1988 TVA/NRC meeting and the August 31, 1988 teleconference on control room habitability. You are requested to notify TVA if you do not agree with the contents of this letter. Commitments made during that meeting and teleconference are confirmed by this letter and are listed in enclosure 1.

At the August 11, 1988 meeting, TVA discussed the current as-constructed Control Room Emergency Ventilation System (CREVS) and the design commitment contained in the Browns Ferry Final Safety Analysis Report (FSAR) and Technical Specifications. The CREVS does not meet the commitment to have essentially zero infiltration of unfiltered air into the control room envelope. Control room operator doses were calculated for the design basis loss of coolant accident (LOCA) and a fuel handling accident. These analyses assumed worst case wind conditions and the amount of predicted unfiltered duct leakage. The LOCA was the controlling accident. Post-LOCA whole body gamma and beta skin doses to the control room operators would be below the guidelines of 10 CFR 50, appendix A, General Design Criterion (GDC) 19, "Control Room." Control room operators' thyroid dose would exceed the guidelines of GDC 19 but be below the guidelines of 10 CFR 100.11 for an individual located at the exclusion area boundary.

TVA proposed the submittal of a temporary Technical Specification amendment to allow one cycle of operation with the CREVS declared inoperable. NRC stated that the submittal of a Technical Specification amendment was an acceptable and appropriate way of addressing this issue. This submittal will include a discussion of the controlling design basis accident, calculated operator doses, and a commitment to take compensatory actions during this cycle. Possible compensatory actions discussed at the meeting were the use of Potassium Iodide tablets, use of bottled air or respirators, running more than two trains of the Standby Gas Treatment System (SGTS) to increase the negative pressure in the secondary containment building, monitoring radiological and meteorological conditions, and/or shutting down the control building air supply fans.

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During the August 31, 1988 teleconference which involved Messrs. Gears, Spickler, and Wescott of the staff, TVA stated that the compensatory actions to be included in the temporary Technical Specification amendment would be:

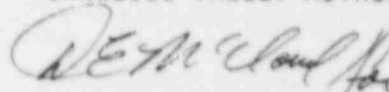
- 1) The revision of Radiological Control Procedures to require the distribution of Potassium Iodide tablets to all control room and Technical Support Center personnel once the RADCON manager has reason to believe that a person's projected cumulative dose to the thyroid from inhalation of radioactive Iodine might exceed  $10 \mu\text{Ci}$ . This procedure would also include sufficiently detailed information to allow the RADCON manager to make this determination.
- 2) The Standby Gas Treatment System Operating Instructions would also be revised to clarify the need to keep all available trains of the SGTS operating during emergency conditions.

TVA confirms the commitments made during the August 11, 1988 meeting to submit this temporary Technical Specification amendment by September 30, 1988 and to present the long-term corrective action plan to NRC within ninety days after unit 2 restart. It is our understanding that the staff committed to review TVA's proposed temporary Technical Specification amendment within sixty days of receipt of the submittal.

Please refer any questions regarding this submittal to M. J. May, Manager, BFN Site Licensing, (205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Manager  
Nuclear Licensing and  
Regulatory Affairs

Enclosure  
cc: See page 3

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cc (Enclosure):

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Browns Ferry Resident Inspector  
Browns Ferry Nuclear Plant  
Route 12, Box 637  
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ENCLOSURE 1

LISTING OF COMMITMENTS

- 1) TVA will submit a control room habitability temporary technical specification amendment by September 30, 1988. This submittal will include a discussion of the controlling design basis accident, calculated operator doses, and a commitment to take compensatory actions during this cycle.
- 2) TVA will present the long-term control room habitability corrective action plan to the NRC within ninety days after restart.