

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

00T 05 1988

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) - RESPONSE TO GENERIC SAFETY EVALUATION REPORT (SER) ON SEISMIC QUALIFICATION UTILITY GROUP (SQUG) RESOLUTION OF UNRESOLVED SAFETY ISSUE A-46

On July 29, 1988, the NRC staff issued a SER on revision 0 of the Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment developed by the SQUG. The letter to SQUG enclosing the SER requests that SQUG member utilities provide to NRC, within 60 days, a schedule for implementing the GIP. By letter dated August 19, 1988 to Mr. L. C. Shao, SQUG clarified that the 60 days would expire on October 7, 1988. This letter responds to the NRC request for our plant-specific seismic verification plans for Browns Ferry consistent with the requirements of Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46."

As members of SQUG and the Electric Power Research Institute (EPRI), we have supported the many efforts on which the GIP is based. The SER endorses the methodology and criteria embodied in revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG and its contractors is underway to resolve the identified open issues and comments in accordance with the SQUG schedule presented at the August 10-11, 1988 meeting with the NRC staff and included with the SQUG letter to Mr. L. C. Shao dated August 19, 1988. This schedule projects completion of revision 2 of the GIP in Spring, 1989, contingent upon SQUG and NRC agreement on the resolution of the various open issues. Revision 2 of the GIP is the version which is scheduled to contain all of the information needed to implement the USI A-46 generic letter at SQUG member plants. The final NRC SER Supplement on revision 2 of the GIP is anticipated by mid-1989.

TVA's plan for implementation of the GIP at BFN is preliminary, given the current status of and schedule for completion of revision 2 of the GIP and NRC's SER Supplement on that revision. However, it is our current plan to resolve USI A-46 for BFN using the generic criteria and methodology included in revision 0 of the GIP, as clarified by the SQUG responses to the NRC's SER in SQUG letter to Mr. L. C. Shao dated September 22, 1988. Assuming no major changes in the workscope currently envisioned, as described

8810120022 881005
PDR ADOCK 05000259
P PNU

0030
11

U.S. Nuclear Regulatory Commission

OCT 05 1988

in revision 0 of the GIP including criteria to be added for cable raceways, tanks, heat exchangers, and relays, we plan to perform the seismic verification plant walkdown required by the GIP by the conclusion of the second refueling outage after receipt of the final SER Supplement and resolution of all open issues. If the final NRC SER Supplement with no open items is issued by the second quarter of 1989, then the plant walkdown at BFN is expected to be completed before the cycle 7 operation of each unit (e.g., unit 1, cycle 7; unit 2, cycle 7; unit 3, cycle 7). Identification of the safe shutdown equipment, gathering of necessary plant-specific data, and training of our walkdown team members will be initiated before this outage.

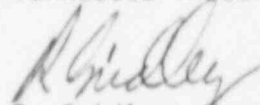
Our current implementation plan and schedule, as described above, are based on the "SQUG Commitments" identified in each section of the GIP. In addition, our implementation and schedule commitment is contingent upon our current understanding of the GIP. If the scope of the final revision of the GIP or the cost and effort required to implement it at BFN change significantly from the current scope and cost estimates, we will reevaluate our commitments. We also desire to integrate the resolution of USI A-46 with the resolution of numerous other related seismic issues (e.g., Eastern Seismicity, Seismic Margins, and Severe Accident Individual Plant External Event Evaluations). In view of the uncertainties in the requirements and schedule for resolution of these related issues, we reserve the right to revise the implementation schedule for USI A-46 at BFN to integrate these potential future requirements into a single, cost-effective program. This possibility has been the subject of on-going discussions with your staff, and further discussions are planned. We will advise you in writing of any changes in our implementation plans and schedules.

Enclosure 1 to this letter summarizes TVA commitments.

If you have any questions concerning this submittal please telephone Patrick Carier at (205) 729-2689.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



R. Gridley, Manager
Nuclear Licensing and
Regulatory Affairs

Enclosure
cc: See page 2

U.S. Nuclear Regulatory Commission

OCT 05 1988

Enclosure

cc: Ms. S. C. Black, Assistant Director
for Projects
TVA Projects Division
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. F. R. McCoy, Assistant Director
for Inspection Programs
TVA Projects Division
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Browns Ferry Resident Inspector
Browns Ferry Nuclear Plant
Route 12, Box 637
Athens, Alabama 35611

ENCLOSURE 1

SUMMARY OF COMMITMENTS
BFN RESPONSE TO GENERIC SER on USI A-46

Perform the seismic verification plant walkdown required by the Generic Implementation Procedure for resolution of USI A-46. This walkdown is to be completed before the cycle 7 operation of each unit (unit 1, cycle 7, unit 2 cycle 7, and unit 3 cycle 7).