TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

OGT 05 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 Docket Nos. 50-259
50-260

BROWNS FERRY NUCLEAR PLANT (BFN) - CLARIFICATION OF INCIDENT COMMANDER REQUIREMENTS

TVA letter dated April 29, 1988, provided the BFN position for Branch Technical Position (BTP) - CMEB 9.5.1, item C.3.b. In the subject letter, TVA stated that the Incident Commander would be a licensed Assistant Shift Operations Supervisor (ASOS). To date, BFN has complied with this commitment. By copy of this letter, TVA is amending its position and will no longer require the incident commander to be a licensed ASOS.

In evaluating the specific requirements of BTP-CMEB 9.5-1 Item C.3.b, we find it states that the brigade leader and at least two brigade members should have sufficient training in or knowledge of plant safety-related systems to understand the effects of fire and fire suppressants on safe shutdown capability. There is no specific requirement that the incident commander be licensed. Current BFN procedures require that fire brigade members or leaders shall participate in an approved training program which meets the guidance of BTP CMEB 9.5-1 and Program Manual Procedure for Fire Program Personnel and Equipment. In addition, the BFN operations personnel receive adequate training for plant safety-related systems in order to perform their regular jobs.

Based on the above, TVA will continue to have the ASOS as the Fire Brigade Incident Commander. An ASOS assigned as Fire Brigade Incident Commander will have completed the BFN License Training Program. If the ASOS has completed the program and did not obtain his license, he will continue to participate in the License Requalification program while still being allowed to act as incident commander.

8810120113 881005 PDR ADOCK 05000259 A006

Based on the above, TVA's position to BTP-CMEB 9.5-1, item C.3.b is as follows:

The BFN fire brigade is trained and equipped for fire fighting to ensure adequate manual fire fighting capability for all areas of the plant containing structures, systems, or components important to safety. The fire brigade has at least five members available on each shift. The incident commander will be an ASOS who has sufficient training in or knowledge of plant safety-related systems to understand the effects of fire and fire suppressants on safe shutdown capability. Additionally, the fire brigade leaders and members have been given specific class room and on-the-job training to provide the required knowledge of safety-related systems. The qualifications of the fire brigade members include an annual physical examination to determine their ability to perform strenuous fire fighting activities. The Shift Operations Supervisor is not a member of the fire brigade. The incident commander is competent to assess the potential safety consequences of a fire and advise the control room personnel.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley, Manager Nuclear Licensing and Regulatory Affairs

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