

From: Green, Kimberly
Sent: Thursday, December 9, 2021 2:42 PM
To: Orf, Tracy J
Cc: Wrona, David
Subject: Acceptance Review Results for Watts Bar Nuclear Plant, Units 1, 2, and 3, License Amendment Request to Revise TS 3.8.7 for Installation of the Control Bay Chiller Cross-Tie (EPID L-2021-LLA-0203)

Dear Mr. Orf:

By letter dated November 5, 2021 (Agencywide Documents Access and Management System Accession No. ML21309A038), Tennessee Valley Authority (TVA) submitted a license amendment request (LAR) for the Browns Ferry Nuclear Plant (Browns Ferry), Units 1, 2, and 3. The proposed amendments would revise Browns Ferry, Units 1, 2 and 3, Technical Specification (TS) 3.8.7, "Distribution Systems - Operating," to allow for the installation of the cross-tie modification between the Units 1 and 2 electric board room air handling units and the Unit 3 control bay chiller.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the proposed LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations*, an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications.

The NRC staff has reviewed TVA's LAR and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendments in terms of regulatory requirements and the protection of public health and safety and the environment. However, during the staff's acceptance review, it identified the need for the following additional information, which are not considered sufficiency items:

- TS Bases (mark-up) pages were not provided (Note that in the Table of Contents for the Enclosure, Attachment 3's title indicates that Bases pages are included; however, Attachment 3 contains clean TS pages). The NRC staff notes that while 10 CFR 50.36(a)(1) does not explicitly describe the acceptable format of the required "bases or reasons for such specifications," submission of Bases pages is one way to satisfy 10 CFR 50.36(a)(1).
- Clarification on whether the compensatory actions listed in the LAR will only be taken during the cross-tie installation period (2 days) or also during the testing period (7 days)
- Explanation of why the proposed wording modifying the existing Conditions and for new Condition I (Unit 1) and Condition J (Units 2 and 3) does not include language accounting for testing of the cross-tie
- Addition of a time limit or refueling outage date for the proposed Note for new Conditions I and J

The NRC staff believes that early identification of the above information needs will allow for the timely provision and review of the information and potentially eliminate the need for multiple rounds of request for additional information. Formal communication of the staff's information needs identified above will be forthcoming.

Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information beyond that identified above is needed, you will be advised by separate correspondence.

Based on the information provided in TVA's submittal, the NRC staff has estimated that this licensing request will take approximately 500 hours to complete and that the review can be completed by December 9, 2022. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates will be communicated, during the routine interactions. These estimates are based on the staff's initial review of the application and they could change, due to several factors including requests for additional information and unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1627.

Sincerely,
Kimberly J. Green, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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From: Green, Kimberly

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