

**From:** Kimberly Green  
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**To:** Eckermann, Jeremy Beau  
**Subject:** Browns Ferry TSTF-505 Audit Questions - Part 3 (EPID L-2022-LLA-0049)  
**Attachments:** Additional Audit Questions for Browns Ferry TSTF 505 - EEEB 091322.docx

Beau,

The June 14, 2022, Audit Plan (ML22147A137) states that “[t]hroughout the audit period, the NRC staff will submit audit questions and audit-related requests to TVA so that TVA can better prepare for audit discussions with NRC staff.” Attached is the third set of NRC staff audit questions.

We look forward to discussing these questions and TVA’s responses during the virtual audit meeting that is currently taking place, possibly on Wednesday or Thursday. Please contact me at any time prior if a clarification discussion is needed.

Please post the responses for the questions to the Certrec Portal as the responses are completed.

Let me know if you have any questions.

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**AUDIT QUESTIONS  
LICENSE AMENDMENT REQUEST  
TO REVISE TECHNICAL SPECIFICATIONS  
TO ADOPT TSTF-505, REVISION 2  
TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3  
DOCKET NOS. 50-259, 50-260, AND 50-296**

Table E1-1 of Enclosure 1 to the LAR includes descriptions of the design success criteria (DSC) of TSs proposed for inclusion in the RICT program.<sup>1</sup> Column 3, "SSCs Covered by TS LCO Condition," describes the SSCs addressed by each action requirement, and Column 6, "Design Success Criteria," provides a summary of the success criteria from the design basis analyses. Regarding the information in these columns for certain TS Conditions, the NRC staff has the following questions.

**Question 18 (EEEB) – TS 3.8.1, Condition F (U1 & U2) and Condition F (U3)**

Explain the minimum required AC sources, which are listed as one offsite AC power source AND three of four DGs, which seems inconsistent with line items in Table E1-1 for TS 3.8.1, Conditions A and B which require either for safe shutdown.

**Question 19 (EEEB) – TS 3.8.4, Condition A (U1 & U2) and Condition A (U3)**

- a. Explain why column 3 is inconsistent for SSCs listed in column 2. Inoperable DG DC subsystems are addressed by TS 3.8.4, Condition C (e.g., U1 TS)
- b. Explain why column 6 refers to an inoperable DC subsystem in reference to 250 VDC shutdown boards, which has no impact on 250 VDC shutdown boards since powered by their own batteries based on UFSAR 8.5.3.5, "Distribution System."

**Question 20 (EEEB) – TS 3.8.7, Condition A (U1 & U2) and Condition A (U3), and TS 3.8.7, Condition E (U1) and Condition F (U3)**

Explain why column 6 does not address a minimum of three shutdown boards for safe shutdown, which seems inconsistent with the TS Bases for TS 3.8.7, Action A.1 on page B 3.8-89 and column 6 of TS 3.8.1, Condition B in Table E1-1.

**Question 21 (EEEB) – TS 3.8.7, Condition B (U1, U2, U3)**

Explain why column 3 does not list RMOV boards available per unit identified specifically in the LCO.

**Question 22 (EEEB) – TS 3.8.7, Condition D (U1) and TS 3.8.7, Condition E (U2 or U3)**

- a. Explain why columns 3 and 6 appear inconsistent regarding the correct number of 250 VDC shutdown boards because column 3 refers to five shutdown boards and column 6 refers to three of four shutdown boards. The TS BASES on page B3.8-58 refers to four

250 VDC shutdown boards for Units 1 and 2, and LCO 3.8.4, Condition A in Table E1-1 refers to four for Unit 3.

- b. Explain why column 6 for Condition E (U3) describes only the U1 and U2 shutdown boards.

**Question 23 (EEEB) – TS 3.8.7, Condition F (U2)**

Explain why there is no line item for U2 in Table E1-1, which appears inconsistent with the markup for Unit 2 TSs (page 106 of 449 of the LAR) and LAR Table E1-3.

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<sup>1</sup> Polickoski, J.T., TVA, letter to the NRC, “License Amendment Request to Revise Technical Specifications to Adopt Risk-Informed Completion Times” dated March 31, 2022 (ML22090A287)