

October 5, 2000

Mr. J. A. Scalice
Chief Nuclear Officer
and Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

SUBJECT: BROWNS FERRY UNITS 2 AND 3, PROPOSED TECHNICAL
SPECIFICATIONS CHANGE REGARDING EXCESS FLOW CHECK VALVES,
REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MA6407 AND
MA6409)

Dear Mr. Scalice:

By letter dated August 11, 2000 (TS-400), you submitted an amendment application to revise the Units 2 and 3 Technical Specifications related to excess flow check valves. The staff is currently reviewing your request. The reviewers have determined that additional information is needed. The reviewers' questions are attached. These questions have been previously discussed with your staff.

For the staff to complete its review schedule, your response to these questions is needed on or before October 20, 2000. This mutually agreed upon date, was discussed with Steve Austin in an October 2, 2000 telecon. If you have any questions regarding this issue, please contact me at 301-415-3026.

Sincerely,

/RA/

William O. Long, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-260 and 50-296

Enclosure: Request for Additional Information

cc w/enclosure: See next page

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REQUEST FOR ADDITIONAL INFORMATION
BROWNS FERRY UNITS 2 AND 3, PROPOSED CHANGES TO TECHNICAL
SPECIFICATIONS REGARDING EXCESS FLOW CHECK VALVES
TAC NOS. MA6407 AND MA6409

1. The operating time used in the failure rate calculation is based on 67 valves, but it appears that both Units 2 and 3 operating cycles were used to develop the operating time. Please clarify the number of excess flow check valves that are installed and tested, in each unit.
2. Section III.B of Enclosure 1 of your submittal states: "Any future excess flow check valve (EFCV) failure would be evaluated per the corrective action program. Additionally, as part of the implementation of this amendment, the 10 CFR 50.65 Maintenance Rule Program will be revised to include a specific EFCV performance acceptance criteria." Please provide a discussion of the current criteria and explain in general terms how the new acceptance criteria might differ from the current criteria.
3. The proposed bases do not include the following from Technical Specification Task Force Item #334 (TSTF-334); "In addition, the EFCVs in the sample are representative of the various plant configurations, models, sizes and operating environments. This ensures that any potentially common problem with a specific type or application of EFCV is detected at the earliest possible time" Please explain why this part of TSTF-334's Insert 1 was not incorporated.
4. Is credit taken for the 1/4-inch flow restriction when evaluating the radiological dose assessment? Provide a discussion of the assumptions used in calculating the mass of fluid released in the postulated instrument line break used for the dose calculations.
5. Browns Ferry Nuclear Power Plant, Unit 2 and 3, experienced a larger number of EFCV failures than other plants in the Boiling Water Reactor Owners' Group survey, mostly during restart of both units. Tennessee Valley Authority states that these failures are attributed to crud buildup and valve sticking, test methodology, lack of experience of the test personnel, and the failure of a valve spring. Since the extended outage intervals were essentially equivalent to the requested surveillance extension, provide a discussion of corrective actions, including maintenance, procedures, personnel training, valve characteristics and test methodology evaluations/revisions that were implemented to limit future EFCV failures.

Enclosure

Mr. J. A. Scalice
Tennessee Valley Authority

BROWNS FERRY NUCLEAR PLANT

cc:

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