

May 7, 2003

MEMORANDUM TO: Allen G. Howe, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Kahtan N. Jabbour, Senior Project Manager, Section 2/**RA**/
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE APRIL 23, 2003, DROP-IN MEETING WITH
TIM ABNEY REGARDING THE ALTERNATIVE SOURCE TERM
FOR BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3
(TAC NOS. MB5733, MB5734, AND MB5735)

In the morning of April 23, 2003, S. LaVie, U. Shoop, H. Walker, E. Forrest and K. Jabbour of the Office of Nuclear Reactor Regulation participated in a drop-in meeting with the Licensing Manager for Browns Ferry Nuclear Plant (BFN), Tim Abney. Mr. Abney's main reason for being here was to participate in a BFN license renewal meeting that afternoon. The purpose of the morning drop-in meeting was to discuss a potential road map that may accommodate Tennessee Valley Authority's (TVA's) objective of taking credit for the Standby Liquid Control (SLC) system in its current licensing application on alternative source term (AST). The SLC system is not a safety system at BFN, however, it is needed to raise the pH level in the suppression pool following a postulated loss-of-coolant accident (LOCA).

Mr. Abney's proposal, which was discussed in this meeting, is provided below.

1. TVA proposes to request an exemption from General Design Criterion (GDC)-41 because the SLC system as currently configured at BFN does not meet the single-failure requirements of GDC-41. Therefore, it cannot be considered a safety-related system. In its exemption request, TVA is expected to demonstrate that the intent of GDC 41 can be met. The exemption would allow TVA to take credit for the SLC to maintain the pH level greater than 7 in the suppression pool following a postulated LOCA. This would add sufficient buffer to prevent the re-evolution of elemental iodine from solution. The AST implementation is needed to produce acceptable dose results for power uprate.
2. To justify the exemption, BFN will provide an analysis which will assume failure of the SLC system. TVA's preliminary analysis indicates that the resulting dose at the low-population zone boundary would be approximately 24.9 rem (TEDE [total effective dose equivalent]). The dose limit in 10 CFR 50.67 is 25 rem (TEDE).

3. The above analysis will not be the analysis of record but will only be used to justify the exemption request. It will use some of the Technical Information Document, TID 14844, source term values and some of the AST values (a hybrid calculation). The analysis will not take credit for any filter system.
4. TVA will retain the filter systems at BFN as an important defense-in-depth measure.
5. TVA may request that the testing schedule for the filters be changed from every 24 months to every 48 months.

The NRC participants did not make any decision regarding this proposal.

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/RA by K.Jabbour/

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