

September 27, 2005

TVA-BFN-TS-424

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop: OWFN P1-35
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of)	Docket No. 50-296
Tennessee Valley Authority)	

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 3 - REVISED
IMPLEMENTATION DATE FOR LICENSE AMENDMENTS AND TECHNICAL
SPECIFICATION (TS) CHANGES - REVISION IN THE NUMBER OF EMERGENCY
CORE COOLING SYSTEMS REQUIRED IN RESPONSE TO A LOSS OF COOLANT
ACCIDENT (TS-424) (AMENDMENT 248)**

This letter request that Amendment 248 to BFN Unit 3 License DPR-68 be re-issued to reflect implementation during the Unit 3, Cycle 13 refueling outage.

TVA's planned restart of Unit 1 will require modifications to eliminate the potential for overloading a Units 1/2 4KV shutdown board or diesel generator when both Units 1 and 2 are in-service. The proposed modifications were described in TS 424, which was submitted in Reference 1 and approved by NRC in Reference 2.

As discussed in those submittals, the associated modifications will reduce the number of Emergency Core Cooling System (ECCS) subsystems that are actually available in response to certain design basis Loss of Coolant Accident (LOCA) scenarios. The present BFN LOCA analysis is conservative with respect to the current plant's actual equipment availability. The reduced number of available ECCS subsystems had previously been analyzed and is consistent with the current LOCA analysis. The Unit 3 modifications are not required to eliminate the potential for

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overloading any units' shutdown board or diesel generator. They may be performed at TVA's discretion for fidelity between the three units.

TVA had originally planned to implement the Unit 3 modifications during the Unit 3, Cycle 12 refueling outage (March 2006). TVA now plans to implement these modifications during the subsequent refueling outage. Therefore, TVA requests that Amendment 248 to BFN Unit 3 License DPR-68 be re-issued to reflect implementation during the Unit 3, Cycle 13 refueling outage. TVA requests this re-issuance by December 30, 2005 in order to support planning for the upcoming outage.

TVA has determined that the additional information provided does not affect the no significant hazards considerations associated with the proposed amendment and TS changes. The proposed amendment and TS changes still qualify for a categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9).

If you have any questions about this submittal, please contact me at (256) 729-2636. I declare under penalty of perjury that the foregoing is true and correct. Executed on September 27, 2005.

Sincerely,

Original signed by:

William D. Crouch
Manager of Licensing
and Industry Affairs

References:

1. TVA letter to NRC, dated April 11, 2003, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2 and 3 - License Amendments and Technical Specification Changes - Revision in the Number of Emergency Core Cooling Systems Required in Response to a Loss of Coolant Accident (TS-424)."
2. NRC letter to TVA, dated April 1, 2004, "Browns Ferry Nuclear Plant, Units 1, 2 and 3 - Issuance of Amendment Regarding the Emergency Core Cooling Systems (TAC Nos. MB8423, MB8424 and MB8425) (TS-424)."

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