

October 14, 2005

10 CFR 72.212

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of)	Docket Nos.	50-259
Tennessee Valley Authority)		50-260
			50-296
			72-052

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 -
INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) -
CERTIFICATE OF COMPLIANCE (COC) NO. 1014, AMENDMENT 1,
CONDITION 9, SPECIAL REQUIREMENTS FOR FIRST SYSTEMS IN PLACE**

Reference: TVA letter to NRC dated September 19, 2005,
"Browns Ferry Nuclear Plant (BFN) - Units 1, 2,
and 3 - Independent Spent Fuel Storage Installation
(ISFSI) - Registration of Spent Fuel Storage Casks
Pursuant to 10 CFR 72.212(b)(1)(ii)

In the above reference, TVA registered with NRC the initial use of three Holtec Type 68 multi-purpose canisters (MPCs) for BFN. The purpose of this letter is to satisfy the requirement to provide heat load validation test results, for up to 16 kilowatt (kW), for those casks.

In accordance with Condition 9 of COC No. 1014, a report of the heat transfer characteristics for each unique cask system (i.e., unique MPC type) shall be submitted if the cask system has a heat load equal to or greater than 10 kW. Temperature measurements shall be recorded and analyzed to demonstrate the validity of the analytic methods and predicted thermal behavior of the HI-STORM Cask System.

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The COC also states that no additional testing is required for a cask system after it has been tested at a heat load equal to or greater than 16 kW. Further, cask users may satisfy the COC requirements by referencing validation test reports submitted to the NRC by other cask users.

Accordingly, TVA is using the validation test performed at Columbia Generating Station (Holtec Report HI-2043195) using an MPC-68 with a 17.1 kW heat load. The results of this validation test were submitted to NRC by Energy Northwest in a letter dated July 28, 2004. Holtec International determined that the test results validated the analytical methods and predicted thermal behavior described in Section 4 of the HI-STORM 100 CFSAR, Revision 2. Therefore, Holtec Report, HI-2043195, is referenced in the BFN 10 CFR 72.212 Report of Evaluations for Condition 9 of COC No. 1014.

There are no new regulatory commitments in this letter. If you have any questions, please contact me at (256) 729-2636.

Sincerely,

Original signed by:

William D. Crouch
Manager of Licensing
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cc: See Page 3

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cc:

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