

December 12, 2005

10 CFR 54

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 Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 -
LICENSE RENEWAL APPLICATION (LRA) - RESPONSE TO NRC REQUEST
FOR CLARIFICATION OF COMMITMENT TABLES CONTAINED IN THE
SAFETY EVALUATION REPORT (TAC NOS. MC1704, MC1705, AND
MC1706)**

By letter dated December 31, 2003, TVA submitted, for NRC review, an application pursuant to 10 CFR 54, to renew the operating licenses for the Browns Ferry Nuclear Plant, Units 1, 2, and 3. As part of its review of TVA's LRA, the NRC staff, through an informal request on November 3, 2005, requested clarification of the information provided in the Commitment Tables provided in the Safety Evaluation Report (SER) With Open Items Related to License Renewal of Browns Ferry Nuclear Plant. The enclosure to this letter contains the requested clarifications.

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Additionally, this letter incorporates:

- Comments concerning the Commitment Tables from TVA's letter dated September 14, 2005 [Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - License Renewal Application - Results of Review of Safety Evaluation Report (SER) With Open Items Related To License Renewal of Browns Ferry Nuclear Plant (TAC NOS. MC1704, MC1705, and MC1706)]; and
- Commitments contained in TVA's letter to the NRC dated November 16, 2005 [Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - License Renewal Application (LRA) - Supplemental Responses To NRC Requests (TAC NOS. MC1704, MC1705, and MC1706)].

If you have any questions regarding this information, please contact Ken Brune, Browns Ferry License Renewal Project Manager, at (423) 751-8421.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 12th day of December, 2005.

Sincerely,

Original signed by:

William D. Crouch
Manager of Licensing
and Industry Affairs

Enclosure:

cc: See page 3

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Enclosure

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cc: continued page 4

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Enclosure

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s://Licensing/Lic/Submit/Subs/BFN LR Clarification for Commitment Tables in the SER.doc

ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3
LICENSE RENEWAL APPLICATION (LRA)

RESPONSE TO NRC REQUEST FOR CLARIFICATION OF COMMITMENT
TABLES CONTAINED IN THE SAFETY EVALUATION REPORT

(SEE ATTACHED)

**TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNITS 1, 2, AND 3
LICENSE RENEWAL APPLICATION (LRA)**

**RESPONSE TO NRC REQUEST FOR CLARIFICATION OF COMMITMENT
TABLES CONTAINED IN THE SAFETY EVALUATION REPORT**

By letter dated December 31, 2003, TVA submitted, for NRC review, an application pursuant to 10 CFR 54, to renew the operating licenses for the Browns Ferry Nuclear Plant, Units 1, 2, and 3. As part of its review of TVA's LRA, the NRC staff, through an informal request on November 3, 2005, requested clarification of the information provided in the Commitment Tables provided in the Safety Evaluation Report (SER) With Open Items Related to License Renewal of Browns Ferry Nuclear Plant. This enclosure contains the requested clarifications.

Additionally, this enclosure incorporates:

- Comments concerning the Commitment Tables from TVA's letter dated September 14, 2005 [Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - License Renewal Application - Results of Review of Safety Evaluation Report (SER) With Open Items Related To License Renewal of Browns Ferry Nuclear Plant (TAC NOS. MC1704, MC1705, and MC1706)]; and
- Commitments contained in TVA's letter to the NRC dated November 16, 2005 [Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - License Renewal Application (LRA) - Supplemental Responses To NRC Requests (TAC NOS. MC1704, MC1705, and MC1706)].

Based on the clarifications provided in this letter, the SER needs to be updated as follows:

1. The following references should to be added to Appendix B of the SER:
 - September 14, 2005 Letter from Mr. B. O'Grady, Tennessee Valley Authority (TVA) to the NRC - Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - License Renewal Application - Results Of Review Of Safety Evaluation Report (SER) With Open Items Related To License Renewal Of Browns Ferry Nuclear Plant (Accession No. ML052630075).

- November 16, 2005 Letter from Mr. W. D. Crouch,
Tennessee Valley Authority (TVA) to the NRC - Browns
Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - License
Renewal Application (LRA) - Supplemental Responses To
NRC Requests
2. SER Tables 1, 2, and 3 should be revised to be consistent
with Tables 1, 2, and 3 attached to this enclosure.

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
1. Accessible Non-Environmental Qualification Cables and Connections Inspection Program	Develop and implement new program.	A.1.1	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.1
2. Electrical Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits Program	Revise implementing documents for LPRM cable system aging to reference existing Technical Specification requirements and license renewal reference(s).	A.1.2	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.2 Response to follow-up to RAI 2.5-2 dated March 2, 2005
	Develop and implement new program to manage IRM cable system aging.		Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.2 Response to follow-up to RAI 2.5-2 dated March 2, 2005
3. Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program	Develop and implement new program to manage the medium-voltage cables to the Residual Heat Removal Service Water pumps.	A.1.3	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.3 Response to RAI 3.6-3(a) dated December 9, 2004 Response to follow-up RAI 3.6-3 dated January 18, 2005
4. ASME Section XI Inservice Inspection Subsections IWB, IWC, and IWD Program	Revise implementing documents to include license renewal reference(s).	A.1.4	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.4
5. Chemistry Control Program	Revise implementing documents to include license renewal reference(s).	A.1.5	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.5

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
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Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
6. Reactor Head Closure Studs Program	Revise implementing documents to include license renewal reference(s).	A.1.6	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.6
7. Boiling Water Reactor Vessel Inside Diameter Attachment Welds Program	Revise implementing documents to include license renewal reference(s).	A.1.7	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.7
8. Boiling Water Reactor Feedwater Nozzle Program	Revise implementing documents to include license renewal reference(s).	A.1.8	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.8
9. Boiling Water Reactor Control Rod Drive Return Line Nozzle Program	Revise implementing documents to include license renewal reference(s).	A.1.9	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.9
10. Boiling Water Reactor Stress Corrosion Cracking Program	Revise implementing documents to include license renewal reference(s).	A.1.10	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.10
11. Boiling Water Reactor Penetrations Program	Revise implementing documents to include license renewal reference(s).	A.1.11	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.11 Enclosure 1 of TVA letter dated September 14, 2005
12. Boiling Water Reactor Vessel Internals Program	Revise implementing documents to include license renewal reference(s).	A.1.12	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.12
	Inspect the top guide beams		Prior to the period of extended operation	<ul style="list-style-type: none"> Response to NRC Question (3) dated May 25, 2005

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
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Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
12. Boiling Water Reactor Vessel Internals Program (continued)	Establish an aging management program for the steam dryers.		Two years before the first BFN unit enters the period of extended operation	• Response to RAI 3.1-1 dated January 31, 2005
	Enhance the Reactor Pressure Vessel Internals Inspection (RPVII) Units 1, 2, and 3 procedure to require visual inspection of the Access Hole Covers (AHCs) and inspection of the AHC welds.		Two years before the first BFN unit enters the period of extended operation	• Response to RAI B.2.1.12-1(C) dated January 31, 2005 • Response to NRC Question (7) dated May 25, 2005
	Implement the inspection of weld TS-2 (BWRVIP-41).		When inspection technique for weld TS-2 being developed by the BWRVIP Inspection Committee is available.	• Response to Question (12) dated May 25, 2005
13. Flow-Accelerated Corrosion Program	Revise implementing documents to include license renewal reference(s).	A.1.14	Prior to the period of extended operation	• LRA Section B.2.1.15
14. Bolting Integrity Program	Revise implementing documents to include license renewal reference(s).	A.1.15	Prior to the period of extended operation	• LRA Section B.2.1.16
15. Open-Cycle Cooling Water System Program	Revise implementing documents to include license renewal reference(s).	A.1.16	Prior to the period of extended operation	• LRA Section B.2.1.17
16. Closed-Cycle Cooling Water System Program	Revise implementing documents to include license renewal reference(s).	A.1.17	Prior to the period of extended operation	• LRA Section B.2.1.18
17. Inspection of Overhead Heavy Load and Light Load Handling Systems Program	Revise implementing documents to include license renewal reference(s).	A.1.18	Prior to the period of extended operation	• LRA Section B.2.1.20

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
18. Compressed Air Monitoring Program	Revise implementing documents to: <ul style="list-style-type: none"> • Include license renewal reference(s). • Incorporate guidelines in ASME OM-S/G-2000, Part 17; ANSI/ISA-S7.0.01-1996; and EPRI TR 108147. 	A.1.19	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.21
19. BWR Reactor Water Cleanup System Program	Revise implementing documents to include license renewal reference(s).	A.1.20	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.22
20. Fire Protection Program	Revise implementing documents to include license renewal reference(s).	A.1.21	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.23
21. Fire Water System Program	Revise implementing documents to: <ul style="list-style-type: none"> • Include license renewal reference(s). • Perform flow tests or non-intrusive examinations to identify evidence of loss of material due to corrosion. 	A.1.22	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.24
	Perform sprinkler head inspections to ensure signs of degradation, such as corrosion, are detected in a timely manner.		Prior to exceeding the 50-year service life for any sprinkler	<ul style="list-style-type: none"> • LRA Section B.2.1.24
22. Aboveground Carbon Steel Tanks Program	Revise implementing documents to include license renewal reference(s).	A.1.23	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.26
23. Fuel Oil Chemistry Program	Revise implementing documents to include license renewal reference(s).	A.1.24	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.27 • Enclosure 1 of TVA letter dated September 14, 2005

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
24. Reactor Vessel Surveillance Program	Revise implementing documents to include license renewal reference(s).	A.1.25	Prior to the period of extended operation	• LRA Section B.2.1.28
	Enhance the Integrated Surveillance Program (ISP) per proposed BWRVIP-116.		Prior to the period of extended operation	• LRA Section B.2.1.28
	If the ISP is not approved two years prior to the commencement of the license renewal period, a plant-specific surveillance program for each BFN unit will be submitted to the NRC.		Two years prior to the commencement of the license renewal period	• Response to RAI B.2.1.28-1(A) dated January 31, 2005 • Response to Question (9) dated May 25, 2005
	Maintain Unit 1 and Unit 3 surveillance capsules (standby capsules) available to the ISP.		Unit 3 is Ongoing Unit 1 will commence at restart.	• Response to Question (10) dated May 25, 2005
25. One-Time Inspection Program	Develop and implement new program.	A.1.26	Prior to the period of extended operation	• LRA Section B.2.1.29
	Develop and submit procedure for NRC review.		At least two years prior to the expiration of the current operating license	• Response to Proposed Unresolved Item 3.0-4 LP dated May 27, 2005
	Perform a one-time inspection of the ASME equivalent Class MC supports in a submerged environment of the Units 2 and 3 Torus.		Prior to the period of extended operation	• Response to RAI B.2.1.33-2 dated January 18, 2005
	Perform a one-time inspection of the in-scope submerged concrete in one individual CCW pump bay of the Intake Pumping Station.		Prior to the period of extended operation	• Response to Question 359 dated October 8, 2004 • Response to RAI 3.5-16 dated April 5, 2005

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
25. One-Time Inspection Program (continued)	Perform ultrasonic thickness measurements of tank bottoms for those tanks specified in the Fuel Oil Chemistry Program (B.2.1.27) and the Aboveground Carbon Steel Tanks Program (B.2.1.26).		Prior to the period of extended operation	<ul style="list-style-type: none"> Response to RAI 7.1.19-1 dated May 25, 2005
26. Selective Leaching of Materials Program	Develop and implement program.	A.1.27	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.30
27. Buried Piping and Tanks Inspection Program	Revise implementing documents to include license renewal reference(s).	A.1.28	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.31
	Add a trigger to the excavation permit document to require notification of engineering to perform a piping inspection when piping is excavated.		Complete	<ul style="list-style-type: none"> NRC Inspection Report dated January 27, 2005
	Determine (via engineering evaluation) if sufficient inspections have been performed to draw conclusion regarding ability of underground coating to protect piping. If required, conduct a focused inspection to draw conclusion concerning the coating.		Within ten years after entering the period of extended operation	<ul style="list-style-type: none"> Response to RAI 7.1.22-1 dated May 25, 2005
28. ASME Section XI Subsection IWE Program	Revise implementing documents to inspect buried piping when it is excavated.	A.1.29	Complete	<ul style="list-style-type: none"> Response to RAI 7.1.22-1 dated May 25, 2005
	Revise implementing documents to include license renewal reference(s).		Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.32

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Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
29. ASME Section XI Subsection IWF Program	Revise implementing documents to include license renewal reference(s).	A.1.30	Prior to the period of extended operation	• LRA Section B.2.1.33
	Enhance program to manage the aging effects of ASME equivalent Class MC supports.		Prior to the period of extended operation	• Response to Follow-up RAI B.2.1.33-1 dated May 31, 2005
30. 10 CFR 50 Appendix J Program	Revise implementing documents to include license renewal reference(s).	A.1.31	Prior to the period of extended operation	• LRA Section B.2.1.34
31. Masonry Wall Program	Revise implementing documents to include license renewal reference(s).	A.1.32	Prior to the period of extended operation	• LRA Section B.2.1.35
	Revise implementing procedures to clearly identify structures with masonry walls within scope and to clarify qualification requirements for personnel who perform masonry wall walkdowns.		Prior to the period of extended operation	• LRA Section B.2.1.35
32. Structures Monitoring Program	Revise implementing documents to include license renewal reference(s).	A.1.33	Prior to the period of extended operation	• LRA Section B.2.1.36
	Enhance procedures implementing the 10 CFR 50.65 Maintenance Rule Program to identify all structures and structural components within scope.		Prior to the period of extended operation	• LRA Section B.2.1.36 • Response to GALL audit Question 173 dated October 8, 2004 • Response to GALL audit Question 357 dated October 8, 2004

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(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
32. Structures Monitoring Program (continued)	Enhance procedures implementing the 10 CFR 50.65 Maintenance Rule program sampling approach to include examinations of below-grade concrete when excavated.		Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.36 • Response to GALL audit Question 285 dated October 8, 2004
	Enhance procedures implementing the 10 CFR 50.65 Maintenance Rule program to include the guidance provided in ACI 349.3R-96 Chapter 7.		Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.36
	Enhance LCEI-CI-C9, Attachment 1, "Buried Piping Inspection Checklist," to include "Mechanical Penetration" as an inspection attribute.		Prior to entering the period of extended operation	<ul style="list-style-type: none"> • Response to GALL audit Question 285 dated October 8, 2004
	Revise implementing documents to include license renewal reference(s).		Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.37
33. Inspection of Water-Control Structures Program	Revise implementing documents to identify required structures and structural components within the scope of license renewal.	A.1.34	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.37
	Revise implementing documents to include special inspections following the occurrence of large floods, earthquakes, tornadoes, and intense rainfall.		Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.2.1.37
	Implement periodic monitoring of the raw service water in close proximity to the Intake Pumping Station for the requirements of an aggressive environment.		Prior to the period of extended operation	<ul style="list-style-type: none"> • Response to RAI 3.5-16 dated April 5, 2005
	Revise implementing documents to include license renewal reference(s).		Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.3.1
34. Environmental Qualification Program	Revise implementing documents to include license renewal reference(s).	A.1.35	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section B.3.1

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
35. Fatigue Monitoring Program	Implement enhanced Fatigue Monitoring Program using the EPRI-licensed FatiguePro® cycle counting and fatigue usage tracking computer program.	A.1.36	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.3.2
36. Systems Monitoring Program	Revise implementing documents to include license renewal reference(s).	A.2.1	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.39 Enclosure 1 of TVA letter dated September 14, 2005
37. Bus Inspection Program	Develop and implement new program.	A.2.2	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.40 Response to RAI 3.6-4 dated December 9, 2004
38. Diesel Starting Air Program	Revise implementing documents to include license renewal reference(s).	A.2.3	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.41
39. Periodic Inspection Program	Develop and implement new program.	A.2.4	Prior to the period of extended operation	<ul style="list-style-type: none"> Response to Proposed Unresolved Items 3.0-2 LP (1 & 2) and 3.0-3 LP dated May 27, 2005 Enclosure 1 of TVA letter dated September 14, 2005
	Develop and submit implementing procedure(s) for NRC review.		At least two years prior to the period of extended operation	<ul style="list-style-type: none"> Response to Proposed Unresolved Items 3.0-4 LP dated May 27, 2005

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
40. Time-Limited Aging Analysis: Reactor Vessel Thermal Limit Analyses: Operating Pressure- Temperature Limits (P-T)	Develop and submit revised P-T limits to the NRC for approval.	A.3.1.5	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section A.3.1.5 • LRA Section 4.2.5
41. Time-Limited Aging Analysis: Environmental Qualification of Electrical Equipment	Revise existing EQ program to cover the extended period of operation.	A.3.3	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section 4.4 • LRA Section A.3.3
42. Time-Limited Aging Analysis: Other Plant Specific Time-Limited Aging Analysis: Emergency Equipment Cooling Water Weld Flaw Evaluation	Implement an administrative tracking system to ensure limiting number of fatigue cycles will not be exceeded at the select EECW locations.	A.3.5.7	Prior to the period of extended operation	<ul style="list-style-type: none"> • LRA Section A.3.5.7 • Response to RAI 4.7.8 dated March 2, 2005
43. RAI 2.1-2,A-3	Identify additional piping segments and supports/equivalent anchors to be placed in scope.	N/A	Complete	<ul style="list-style-type: none"> • Response to RAI 2.1-2,A-3 dated September 3, 2004 • TVA response dated February 28, 2005
44. RAI 2.1-2,B	Implement Unit 1, 2, and 3 DCNs to qualify twelve temperature switches in the Turbine Building.	N/A	Prior to the period of extended operation	<ul style="list-style-type: none"> • Response to RAI 2.1-2,B dated September 3, 2004

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
45. RAI 2.1-2,C RHRWSW tunnel	Include 24-inch Raw Cooling Water discharge piping located in the RHRWSW tunnel in scope of license renewal.	N/A	Complete	<ul style="list-style-type: none"> • Response to RAI 2.1-2,C RHRWSW Tunnel dated September 3, 2004 • TVA response dated January 31, 2005
46. RAI 2.1-2,C Intake Pumping Station	Revise 10 CFR 54.4(a)(2) Scoping Methodology document to address components located in the lower compartments of the Intake Pumping Station.	N/A	Prior to next annual update	<ul style="list-style-type: none"> • Response to RAI 2.1-2,C Intake Pumping Station dated September 3, 2004
47. Open Item OI 2.4-3	Perform one time confirmatory ultrasonic thickness (UT) measurements on a portion of the cylindrical section of the drywell on Units 2 and 3.	N/A	Prior to the period of extended operation	<ul style="list-style-type: none"> • Enclosures 1 and 9 of TVA letter dated November 16, 2005
48. Open Item OI 4.7.7	Perform a BFN plant-specific analysis consistent with BWRVIP-25 to demonstrate that the core plate hold-down bolts can withstand required loads, considering the effects of stress relaxation until the end of the period of extended operation. Take appropriate corrective action if the analysis does not satisfy the specified criteria. Submit the analysis or the corrective action taken to resolve the core plate hold-down bolt issue to the NRC for review .	N/A	2 years prior to the period of extended operation	<ul style="list-style-type: none"> • Enclosures 3 and 9 of TVA letter dated November 16, 2005

**TABLE 1: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAs
(NON-UNIT SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
49. Open Item from AMP Inspection on Inspection of RHRWS Piping	Perform a confirmatory inspection of the RHRWS pump pit supply piping. Include instructions in the CCW pump pit Preventive Maintenance Program to periodically inspect the sluice gate valves. Perform a confirmatory inspection of the seismic restraints in the RHRWS pump pit.	N/A	Prior to the period of extended operation	<ul style="list-style-type: none"> Enclosures 4 and 9 of TVA letter dated November 16, 2005

**TABLE 2: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAs
(UNIT 1 SPECIFIC)**

NOTE: This Table does not contain all of the same Item Numbers as contained in Table 1. While there is a one-to-one correlation of items with the same number, the same Item Numbers are not in both tables as explained below:

- For Item Numbers 1. through 49., only those Item Numbers that have a Unit 1 specific commitment are included in this table.
- Item Number 63. applies only to Unit 1.

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
2. Electrical Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits Program	Include Unit 1 High-Range Radiation Monitoring cables in the Environmental Qualification (EQ) Program.	A.1.2	Prior to Unit 1 restart	<ul style="list-style-type: none"> • Response to GALL audit Question 169 dated October 8, 2004
5. Chemistry Control Program	Include Unit 1 in the program.	A.1.5	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.5
7. Boiling Water Reactor Vessel Inside Diameter Attachment Welds Program	Include Unit 1 in the program.	A.1.7	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.7
8. Boiling Water Reactor Feedwater Nozzle Program	Upgrade Unit 1 operating procedures to decrease the magnitude and frequency of feedwater temperature fluctuations.	A.1.8	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.8
10. Boiling Water Reactor Stress Corrosion Cracking Program	Include Unit 1 in the program.	A.1.10	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.10 • Response to GALL audit Question 181 dated October 8, 2004

**TABLE 2: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAS
(UNIT 1 SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
11. Boiling Water Reactor Penetrations Program	Include Unit 1 in the program.	A.1.11	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.11 • Response to GALL audit Question 194 dated October 8, 2004
12. Boiling Water Reactor Vessel Internals Program	Include Unit 1 in the program.	A.1.12	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.12 • Response to Question (4b) dated May 25, 2005
13. Flow-Accelerated Corrosion Program	Include Unit 1 in the program.	A.1.14	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.15 • Response to GALL audit Question 144 dated October 8, 2004
15. Open-Cycle Cooling Water System Program	Include Unit 1 in the program.	A.1.16	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.17 • Response to GALL audit Question 144 dated October 8, 2004
16. Closed-Cycle Cooling Water System Program	Include Unit 1 in the program.	A.1.17	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.18 • Response to GALL audit Question 144 dated October 8, 2004
18. Compressed Air Monitoring Program	Include Unit 1 in the program.	A.1.19	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.21
19. BWR Reactor Water Cleanup System Program	Include Unit 1 in the program.	A.1.20	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.22 • LRA Appendix F.13
20. Fire Protection Program	Update the Fire Protection Report and to incorporate Unit 1 as an operating unit. Fully implement the program on Unit 1.	A.1.21	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Section B.2.1.23

**TABLE 2: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAs
(UNIT 1 SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
21. Fire Water System Program	Update the Fire Protection Report and procedures to incorporate Unit 1 as an operating unit. Fully implement the program on Unit 1.	A.1.22	Prior to Unit 1 restart	<ul style="list-style-type: none"> LRA Section B.2.1.24
24. Reactor Vessel Surveillance Program	Either include Unit 1 within the BWRVIP ISP, or submit for NRC approval a plant specific surveillance program that meets the requirements of 10 CFR 50 Appendix H for the period of extended operation.	A.1.25	Prior to the period of extended operation	<ul style="list-style-type: none"> LRA Section B.2.1.28
	Ensure BWRVIP-86-A and BWRVIP-116 are revised to incorporate Unit 1, and submit to the NRC a license amendment request to implement the ISP for site-specific use for Unit 1.		Prior to the period of extended operation	<ul style="list-style-type: none"> Response to RAI B.2.1.28-1 dated January 31, 2005
25. One-Time Inspection Program	Perform a one-time inspection of the ASME equivalent Class MC supports in a submerged environment of the Unit 1 Torus.	A.1.26	Prior to Unit 1 restart	<ul style="list-style-type: none"> Response to RAI B.2.1.33-2(b) dated January 18, 2005
34. Environmental Qualification Program	Include Unit 1 in the program.	A.1.35	Prior to Unit 1 restart	<ul style="list-style-type: none"> LRA Section B.3.1
47. Open Item OI 2.4-3	Perform one time confirmatory UT measurements on the drywell vertical cylindrical area immediately below the drywell flange.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> Enclosures 1 and 9 of TVA letter dated November 16, 2005

**TABLE 2: BFN COMMITMENT LIST ASSOCIATED WITH LRA APPENDIX A AGING MANAGEMENT PROGRAMS AND TLAAs
(UNIT 1 SPECIFIC)**

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
63. Response to NRC Questions Concerning RPV Internals	Replace all BFN Unit 1 dry tubes.	N/A	Prior to Unit 1 restart	• Response to Question (8) dated May 25, 2005
	Perform MSIP for Unit 1 Control Rod Drive Return Line Cap.		Prior to Unit 1 restart	• Response to Question (6) dated May 25, 2005
	Change the Unit 1 AHCs to bolted design.		Prior to Unit 1 restart	• Response to NRC Question (7) dated May 25, 2005

TABLE 3: UNIT 1 RESTART COMMITMENTS THAT ARE DISCUSSED IN LRA APPENDIX F

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
50. Appendix F.1	Evaluate and modify, as required, main steam leakage path piping to ensure structural integrity.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
51. Appendix F.2	Implement Containment Atmosphere Dilution System modification.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
52. Appendix F.3	Revise Fire Protection Program to ensure compliance with 10 CFR 50 Appendix R. Revise Fire Protection Report per Unit 1 License Condition 2.C.13.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
53. Appendix F.4	Implement Environmental Qualification Program.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
54. Appendix F.5	Address GL 88-01, and make necessary plant modifications.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
55. Appendix F.6	BWRVIP Programs used for Units 2 and 3 will be used for Unit 1.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
56. Appendix F.7	Install ATWS features.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
57. Appendix F.8	Remove Reactor Vessel Head Spray piping in drywell, and seal the primary containment penetrations.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005

TABLE 3: UNIT 1 RESTART COMMITMENTS THAT ARE DISCUSSED IN LRA APPENDIX F

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
58. Appendix F.9	Implement the Hardened Wetwell Vent modification.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
59. Appendix F.10	Cap Service Air and Demineralized Water Primary Containment Penetrations.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
60. Appendix F.11	Modify Auxiliary Decay Heat Removal System to serve Unit 1.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
61. Appendix F.12	Fully implement the Maintenance Rule Unit 1's temporary exemption ceases to be effective.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005
62. Appendix F.13	Replace RWCU piping outside of primary containment with IGSCC resistant piping. Implement actions requested in GL 89-01 for RWCU.	N/A	Prior to Unit 1 restart	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005