

NRC INSPECTION MANUAL

DLR

TEMPORARY INSTRUCTION 2509/001

UNIT 1 FOLLOWUP INSPECTION (UFI) RELATED TO LICENSE RENEWAL APPLICATION (LRA) FOR THE BROWNS FERRY NUCLEAR (BFN) PLANT, UNITS 1, 2, AND 3

2509/001-01 OBJECTIVES

This temporary instruction (TI) provides guidance for a followup inspection of certain BFN Unit 1 license renewal commitments to be fulfilled prior to restart of Unit 1. These LRA commitments are as referenced in the LRA Safety Evaluation Report (SER) for BFN Units 1, 2, and 3 (see sections 2.6.1.1 thru 13, Reference 1). Thirteen hardware modifications/changes to be completed by the applicant will fulfil the terms of the license condition, 2.H, of the renewed facility operating license No. DPR-33.

The primary objective of the follow up inspection is to verify and document the satisfactory completion of a representative sample of the thirteen license renewal commitments prior to Unit 1 restart that will provide reasonable assurance that all have been completed and will make the current licensing basis (CLB) of Unit 1 consistent with the CLB of Units 2 and 3.

2509/001-02 APPLICABILITY

License condition, 2.H, included in the renewed facility operating license No. DPR-33 requires satisfactory completion of thirteen license renewal commitments that are discussed in LRA Appendix F (Reference 2). Successful completion of these items provides a necessary regulatory framework for the renewed license. When these items (i.e., hardware modifications/changes) are completed, the CLB of Unit 1 will be consistent with the CLB of Units 2 and 3.

2509/001-03 BACKGROUND

BFN Unit 1 has been on administrative hold since March 1985. Tennessee Valley Authority (TVA), the applicant, is currently planning to restart Unit 1 in 2007. The unique element to the staff's review of the Unit 1 LRA request was the modifications in the Unit 1 licensing basis to make it consistent with the CLB of Units 2 and 3 prior to restart. The applicant identified in the LRA these modifications needed before restart. The applicant highlighted these modifications, not yet implemented for Unit 1, with bolded borders and shown as a set of consolidated commitments contained in Appendix F of the LRA. This appendix described each of these modifications; its effect on the application; the schedule for resolution; and provided references to LRA sections affected. The applicant committed to satisfactorily resolve these prior to restart of Unit 1. This enabled the applicant to submit an LRA based on the CLB for all three units. The changes are being implemented consistent with the changes made previously to Units 2 and 3. The staff performed its

safety review on the basis that all of these activities and enhancements to Unit 1 will be completed prior to restart.

2509/001-04 INSPECTION REQUIREMENTS

- 04.01 In Manual Chapter, MC 2509-04, for BFN Unit 1 restart (Reference 4) covers the scope of inspection for all of the consolidated BFN Unit 1 restart commitments. Appendix F of the LRA (Reference 2) represents a subset of commitments related to the consolidated Unit 1 restart commitments. It is envisioned that the scope of inspection under this TI will be limited to a verification of a representative sample and formal documentation to conclude with reasonable assurance that Appendix F license renewal commitments are completed and closed. Region II will be responsible for documenting the closure in an inspection report. That report will facilitate removal of the license condition as mentioned above.
- 04.02 The thirteen commitments are shown as Table 3 of the BFN SER (Attachment A to the TI).
- 04.03 The inspector may perform an administrative review of an item, if it has previously been inspected as part of the Browns Ferry Unit 1 Restart Checklist, or conduct independent review of hardware or objective documentation, to satisfy the verification requirement.

2509/001-05 REPORTING REQUIREMENTS

The documentation of the followup inspections is to meet the requirements of IMC 0612 (Reference 3). The resolution of each finding documented in the followup inspection report will be clearly referenced to the original TI 2509-001 report, using tracking numbers as appropriate.

2509/001-06 COMPLETION SCHEDULE

This TI will remain in effect until satisfactory completion of the LRA commitments prior to Unit 1 restart. This TI will be no longer valid and closed out prior to power operations of Unit 1.

2509/001-07 EXPIRATION

This TI will remain in effect 24 months from the date of issuance.

2509/001-08 CONTACTS

The inspection will be conducted by the Team Leader, Aging Management Review Inspection, Region II staff. It is anticipated that the administrative support resources needed to implement the TI requirements will be minimal since Region II is already tracking most of these commitments as a part of Unit 1 restart inspection activities.

Division of License Renewal (DLR), Project Managers (PMs), will assist the Region II staff in completing the inspections.

Any questions regarding this temporary instruction should be addressed to: Caudle Julian, Region II , (404)-562-4603; Mark Lesser, Region II, (404)-562-4667; Ram Subbaratnam, NRR, (301) 415-1478; or Yoira Diaz-Sanabria, NRR, (301) 415-1594.

2509/001-09 STATISTICAL DATA REPORTING

All direct inspection effort expended on this TI is to be charged to 2509/001 for reporting by the HRMS system with an IPE code of LI.

2509/001-10 ORIGINATING ORGANIZATION

The organizations responsible for the technical content of this TI are Office of Nuclear Reactor Regulation (NRR), Division of License Renewal (DLR); and Regional Office, Region II, Division of Reactor Safety (DRS).

2509/001-11 REFERENCES

1. Safety Evaluation Report Related to the License Renewal of the Browns Ferry Nuclear Plant, Units 1, 2, and 3, Docket Nos. 50-259, 50-260, and 50-296, January 12, 2006.
2. Letter from Mr. Mark. J. Burzynski, Tennessee Valley Authority (TVA) to the NRC, submitting the application for the renewal of the operating Licenses for Browns Ferry Nuclear Units 1, 2, and 3, dated December 31, 2003.
3. Inspection Manual Chapter 0612, "Inspection Reports."
4. Browns Ferry Unit 1 Restart Project Inspection Program, Manual Chapter MC-2509, September 8, 2003.
5. Inspection Procedure 92701, "Followup."

END

Attachments:

Appendix A Table 3: License renewal commitments related to Unit 1 restart - LRA
 Appendix F
Appendix B Revision History for TI 2509/001

APPENDIX A
TABLE 3: LICENSE RENEWAL COMMITMENTS RELATED TO UNIT 1 RESTART - 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 • TVA response dated March 2, 2006
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 • TVA response dated March 2, 2006
52. Appendix F.3	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 • TVA response dated March 2, 2006 • TVA response dated April 21, 2006
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 • TVA response dated March 2, 2006
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 • TVA response dated March 2, 2006

APPENDIX A

TABLE 3: LICENSE RENEWAL COMMITMENTS RELATED TO UNIT 1 RESTART - LRA APPENDIX F

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
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 • TVA response dated March 2, 2006
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 • TVA response dated March 2, 2006
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 • TVA response dated March 2, 2006
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 • TVA response dated March 2, 2006
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 • TVA response dated March 2, 2006

APPENDIX A
TABLE 3: LICENSE RENEWAL COMMITMENTS RELATED TO UNIT 1 RESTART - LRA APPENDIX F

Item Number/Title	Commitment	LRA Appendix A (UFSAR)	Implementation Schedule	Source
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 • TVA response dated March 2, 2006
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 • TVA response dated March 2, 2006
62. Appendix F.13	Replace RWCU piping outside of primary containment with IGSCC resistant piping. Implement actions requested in GL 89-10 for RWCU	N/A	Complete	<ul style="list-style-type: none"> • LRA Appendix F • TVA response dated January 31, 2005 • TVA response dated March 2, 2006

APPENDIX B

REVISION HISTORY FOR TI 2509/001

Commitment Tracking Number	Issue Date	Description of Change	Training Requirement	Training Completion Date	Comment Resolution Accession Number
N/A	07/25/06	This temporary instruction (TI) provides guidance for a followup inspection of certain BFN Unit 1 license renewal commitments in fulfilling a proposed license condition prior to restart of Unit 1	No	N/A	ML061590343