

August 29, 2006

10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D.C. 20555-0001

Gentlemen:

In the Matter of)	Docket No. 50-259
Tennessee Valley Authority)	

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 1 - REQUEST FOR
ADDITIONAL INFORMATION (RAI) FOR RESPONSE TO GENERIC LETTER
(GL) GL 87-02, SUPPLEMENT 1 (S1) (TAC NO. MC4796)**

This letter provides additional information requested by NRC (Reference 1) in support of TVA's response to NRC GL 87-02, S1, dated October 7, 2004 (Reference 2). GL 87-02, S1 transmitted NRC's Supplemental Safety Evaluation (SSER) No. 2 for the Seismic Qualification Utility Group's (SQUG's) Generic Implementation Procedure for Seismic Verification of Nuclear Power Plant Equipment, Revision 2 (GIP-2). The NRC approved in SSER No. 2, with certain conditions and exceptions, use of GIP-2 as an acceptable methodology for resolution of NRC Unresolved Safety Issue A-46 (USI A-46), "Seismic Qualification of Equipment in Operating Plants." GIP-2 described the SQUG methodology for performing a plant-specific seismic evaluation for resolution of USI A-46 for affected licensees. GIP-2A consists of GIP-2 revised to incorporate the NRC Staff's clarifications, interpretations, exceptions, and positions identified in SSER No. 2.

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TVA's October 7, 2004, letter provided the results of the BFN Unit 1 seismic verification that was performed in accordance with GL 87-02, S1. The methodology employed for evaluation and resolution of USI A-46 for BFN Unit 1 is consistent with the methodology used to resolve the issue for BFN Units 2 and 3. The Enclosure to this letter provides TVA's response to the subject NRC RAI.

There are no new commitments contained 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
and Industry Affairs

References:

1. NRC letter to TVA, dated July 27, 2006, Browns Ferry Nuclear Plant, Unit 1 - Request for Additional Information for Response to GL 87-02, Supplement 1 (TAC No. MC4796)
2. TVA letter to NRC, dated October 7, 2004, "Browns Ferry Nuclear Plant (BFN) Unit 1 - Response to NRC GL 87-02, Supplement 1 That Transmits Supplemental Safety Evaluation Report No. 2 (SSER No. 2) on SQUG Generic Implementation Procedure, Revision 2, as Corrected on February 14, 1992 (GIP-2)

Enclosure

cc: See Page 3

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Enclosure

cc Enclosure):

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Enclosure

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ENCLOSURE

**TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 1
DOCKET NO. 50-259**

**REQUEST FOR ADDITIONAL INFORMATION (RAI)
FOR RESPONSE TO GENERIC LETTER (GL) GL 87-02,
SUPPLEMENT 1 (TAC NO. MC4796)**

On October 7, 2004, TVA submitted¹ its response to NRC GL 87-02, Supplement 1 (S1) for BFN Unit 1. TVA stated in that response that the seismic verification of BFN Unit 1 had been completed in accordance with GL 87-02, S1.

On July 27, 2006, NRC requested² additional information to support their review of TVA's response to GL 87-02, S1. Each specific NRC request and the TVA response are provided below.

NRC Request 1.0:

In its letter dated October 7, 2004, TVA stated that it will complete the operations review of the BFN Unit 1 USI A-46 verification of Safe Shutdown Equipment List (SSEL) following approval of BFN Unit 1 Operations Procedures, and notify the NRC of the results of that review prior to BFN Unit 1 restart. Please provide the status and the schedule for completion of the verification of SSEL.

TVA Response to NRC Request 1.0

As stated in Enclosure 2 of TVA's response to NRC GL 87-02 S1:

"The BFN-1 Operations Department review of the SSEL against plant operating procedures will be completed after:

- Major plant modifications are complete
- Operating procedures for BFN Unit 1 are completed."

¹ TVA letter to NRC, dated October 7, 2004, "Browns Ferry Nuclear Plant (BFN) Unit 1 – Response to NRC GL 87-02, Supplement 1 That Transmits Supplemental Safety Evaluation Report No. 2 (SSER No. 2) on SQUG Generic Implementation Procedure Revision 2, as Corrected February 14, 1992 (GIP-2)

² NRC letter to TVA, dated July 27, 2006, Browns Ferry Nuclear Plant, Unit 1 – Request For Additional Information For Response To Generic Letter 87-02, Supplement 1 (TAC NO. MC4796)

Based on review of the items on the punch list, the latest systems requiring maintenance and modification work that appear on this list are the Mainsteam and Feedwater systems. The work on these systems is currently on schedule to be complete prior to their System Preoperability Checklist (SPOC) Phase 2 dates, both scheduled for early January 2007. This SPOC process is a comprehensive system by system review to determine if the physical work and testing have been completed and to verify that the system is capable of being operable by reviewing the affected Problem Evaluation Reports (PERs), Design Changes Notices (DCNs), and Work Orders, as well as performing a system walkdown. Based on the scheduled dates for completing the major modifications and the affected operating procedures, TVA plans to complete its USI A-46 SSEL consistency review for BFN Unit 1 during the last month before restart.

NRC Request 2.0:

Enclosure 2 to TVA submittal dated October 7, 2004, provides the BFN Unit 1 USI A-46 Seismic Evaluation Report. Chapter 5 of that report indicated that a total of 84 individual items of mechanical and electrical equipment on the SSEL were identified as outliers. The report indicates that designs have been completed to resolve the outliers where the resolution method was plant modification. The licensee stated that follow-up verification of each outlier that is resolved by work order or design change will be performed during plant area turnover walkdowns as described in Appendix H of the report. Appendix H contains a Punch List of 139 SSEL equipment items requiring verification of the final configuration for outlier resolution prior to plant restart. Please provide the status and specific schedule for completion of the implementation of outlier resolution as delineated in Table 5-1 and Appendix H of the USI A-46 Seismic Evaluation Report.

TVA Response to NRC Request 2.0:

Following the SPOC Phase 2 system by system review process to verify that a system is capable of being operable, TVA performs Area Turnover walkdowns. As part of these Area Turnover walkdowns, TVA will perform the verification of the 139 punch listed "outliers" delineated in Table 5-1 to verify each item's final configuration. The current schedule has all of the Area Turnovers completed in early February 2007.