

400 Chestnut Street Tower II

June 18, 1981

Mr. James P. O'Reilly, Director  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region II - Suite 3100  
101 Marietta Street  
Atlanta, Georgia 30303



Dear Mr. O'Reilly:

OFFICE OF INSPECTION AND ENFORCEMENT BULLETINS 79-02 AND 79-14 -  
BROWNS FERRY NUCLEAR PLANT - 50-259, -260, -296

As discussed with your staff, we are providing the enclosed schedule which outlines final resolution on Browns Ferry Nuclear Plant for OIE Bulletins 79-02 and 79-14.

The enclosed schedule is somewhat extended, however, we believe that it represents a best faith effort on our part and is fully justified for the following reasons. We believe that all significant safety concerns will be fully addressed during the Phase I work (by late 1981, early 1982). Secondly, the work required by these bulletins must be integrated into the overall workload ongoing at Browns Ferry. The workload for NRC required modifications at Browns Ferry has been discussed with NRC in meetings which were held on May 29, 1980 (with D. G. Eisenhut) and also on May 13, 1981 (with you, V. Stello, and S. Hanauer). In these meetings, TVA has pointed out that the modification workload over the next several years is extremely heavy.

Your consideration in this matter will be greatly appreciated. We will be happy to discuss this matter with you at your convenience.

To the best of my knowledge, I declare the statements contained herein are complete and true.

Very truly yours,  
TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

cc: Office of Inspection and Enforcement (Enclosure)  
Division of Reactor Operations Inspection  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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ENCLOSURE

SYNOPSIS OF IE BULLETINS 79-02 AND 79-14 COMPLETION  
FOR BROWNS FERRY NUCLEAR PLANT  
(DOCKET NOS. 50-259, -260, -296)

PHASE I

All piping and hanger inspections required by the subject bulletins will be completed by December 31, 1981. The milestone dates for completion of the inspections of accessible and inaccessible areas are presented below.

	<u>Accessible</u>	<u>Inaccessible</u>
Unit 1	October 1, 1981	End of current refueling outage
Unit 2	December 31, 1981	Complete
Unit 3	August 1, 1981	Complete

The initial evaluation of the inspection data for potential safety problems will be performed and completed almost concurrently with the inspection. As individual inspection discrepancies are discovered they will be sent to EN DES for evaluation. At any time, if the discrepancy is determined to be a potential safety problem, action will be taken in accordance with facility technical specifications within the appropriate limiting condition for operation. Each discrepancy received by EN DES will be evaluated within two days utilizing engineering judgement and by rigorous analysis (if necessary) within 30 days. Most, if not all, of the significant safety problems (those that have the possibility of affecting the pressure boundary integrity) will be corrected within this time period.

## PHASE II

The second phase of evaluation will be to evaluate each system for code compliance. Following the receipt of each inspection data package (i.e., one system in one unit) and any required reinspection, EN DFS will evaluate the inspection information with respect to existing analysis and code requirements. If any significant safety problem is discovered, appropriate action will be taken in accordance with facility technical specifications.

The completion schedule given below reflects the fact that the inspection information received to date indicates that each system in each unit must be rigorously analyzed to ensure compliance.

Unit 1	April 1, 1984
Unit 2	May 1, 1985
Unit 3	November 1, 1984

Justification for this extended schedule is as follows. The 79-02 and 79-14 analysis effort is not the only civil engineering analysis effort that TVA is performing at this time. For Browns Ferry alone, an NRC ordered modification (namely Mark I torus attached piping) is taking precedence over the 79-02 and 79-14 analysis. This is prudent in light of the fact that much of the torus attached piping analysis is converging with the 79-02 and 79-14 analysis. Therefore, most of the piping code analysis will be completed once the torus attached piping analysis is complete. The same 79-02 and 79-14 analysis must also be done on all TVA plants (operational or under construction). Therefore, the above dates are more than justified considering the potential of no safety problems being discovered and other scheduled work.

### PHASE III

Modifications resulting from the rigorous analysis is the next step to ensure compliance. We will commence modification work on the accessible piping as the design drawings are issued and materials made available. The modifications required on inaccessible piping will be made as soon as possible during scheduled outages following the issue of design drawings and receipt of material. Based on the current planning and outage schedule for Browns Ferry those modifications, both accessible and inaccessible, would be completed by the dates given below:

Unit 1	June 1, 1986
Unit 2	June 1, 1987
Unit 3	January 1, 1987

As stated, modifications cannot be performed until the design work in Phase II is complete. Also, as stated, all significant safety problems will be taken care of during the late 1981, early 1982 time frame.

The modification workload for Browns Ferry (as required by NRC) has been presented to NRC in meetings which were held on May 29, 1980 (with D. G. Eisenhut) and also on May 13, 1981 (with J. P. O'Reilly, V. Stello, and S. Hanauer). In these meetings, TVA has pointed out the modification workload over the next several years.

In light of there not being any appreciable safety significance, and the workload facing TVA, we believe that the above modification schedule is prudent.