

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 22, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Denton:

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

By letters from D. G. Eisenhower to All Holders of Construction Permits and Operating Licenses for Boiling Water Reactors dated November 4, 1980 and January 29, 1981, NRC has required that transient analyses performed by General Electric Company (GE) supporting reload submittals received after February 1, 1981 must contain appropriate ODYN code analyses in place of those previously performed with the REDY code for limiting transients. In addition, after January 1982, all operating BWR's with GE analyses must have the limiting transients recalculated with the ODYN code even if no reload submittal has been received by NRC. This letter is to inform you of the reload schedule for the Browns Ferry Nuclear Plant and the problems experienced in complying with the above NRC staff positions.

All reload applications for Browns Ferry Nuclear Plant submitted after February 1, 1981 will include analyses using the ODYN code for the limiting transients. We have previously submitted the reload analyses using ODYN for unit 1, cycle 5. Submittal of our reload analyses using the ODYN code for unit 3, cycle 5 is planned for early November 1981. Browns Ferry unit 2 is not scheduled to shut down for the cycle 4 outage until summer 1982. We intend to continue operation in cycle 4 past January 1982 based on the REDY code, with our cycle 5 reload submittal scheduled for summer 1982.

We submitted a reload application which was based upon REDY transient analyses for unit 2, cycle 4 operation. This reload application was approved by NRC with the issuance of Amendment No. 58 to Facility Operating License No. DPR-52 for Browns Ferry unit 2 dated November 12, 1980. In order to satisfy the requirements of D. G. Eisenhower's letters dated November 4, 1980 and January 29, 1981, it would be necessary for GE to reanalyze by January 1982 the limiting transients for unit 2 cycle 4 using the ODYN code. By the time such a reanalysis is submitted to NRC, reviewed and approved by NRC staff, and implemented by TVA, there would only be a few months remaining in cycle 4.

GE has presented evidence demonstrating that the existing licensing application of the REDY transient model is conservative and that its continued use during an orderly transition to ODYN is appropriate.

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Therefore, we believe that continued operation using the REDY code as a basis poses no undue risk to public safety and that expending the money and manpower to perform and review a redundant ODYN analysis that will be implemented only during the last few months of cycle 4 is not justified. We believe that compliance with the NRC position on unit 2 will result in a burden to TVA and the NRC without a compensating increase in the protection of the public health and safety.

TVA respects NRC's position stated in the aforementioned letters and is not taking exception without what we consider to be good reasons. We believe that NRC thought all plants would have scheduled reloads based on the ODYN code in place by January 1982. By informing NRC of the Browns Ferry unit 2 reload schedule and the impact of their position on TVA we believe that the staff will reconsider the deadline and allow cycle 4 to continue based on REDY until the scheduled outage in summer 1982.

If you disagree with our position outlined in this letter, please get in touch with us immediately through the Browns Ferry project manager.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills

L. M. Mills, Manager

Nuclear Regulation and Safety

Subscribed and sworn to before
me this 22nd day of Sept., 1981.

Bryant M. Lowery
Notary Public

My Commission Expires 4/4/82