

TENNESSEE VALLEY AUTHORITY

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April 20, 1990

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

Gentlemen:

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

BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 3 RESTART PLAN

TVA is preparing a plan to identify and schedule the necessary activities for the restart of Unit 3. The purpose of the plan is to restart Unit 3 safely, without impact on the safe concurrent operation of Unit 2. Since Unit 3 is the same vintage and essentially identical to Unit 2, TVA expects that the design criteria and corrective action programs for Unit 3 will be the same as those for Unit 2. Any significant differences between the Unit 2 and 3 design criteria will be identified to NRC in future submittals. TVA will revise BFN's programs and pursue relief from certain regulatory requirements based on the lessons learned from the Unit 2 restart activities.

The regulatory relief to be pursued is in three areas. First, a revision to the BFN Security Plan will be submitted in accordance with 10 CFR 50.54(p)(2) by May 15, 1990. The revision to the Security Plan will allow the security guards to be relocated from the drywell to the secondary containment in order to satisfy 10 CFR 73.55(d)(8). This will enable TVA to more effectively use its security staffing with no decrease in security plan effectiveness.

In addition, TVA will request an amendment to the Unit 3 technical specifications for fire protection for the duration of the Unit 3 restart activities, up to fuel load. That amendment will be requested by August 10, 1990. Under this proposal, Unit 3 fire protection systems would be maintained consistent with a unit under construction, while maintaining the fire protection systems necessary to protect Unit 2 and the common areas shared between Units 2 and 3. This would allow the necessary Unit 3 corrective actions to proceed expeditiously, without degrading plant fire protection provided for nuclear safety.

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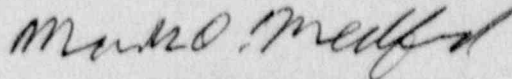
Finally, TVA expects the number of Licensee Event Reports (LERs) will be minimized during the Unit 3 restart activities. This should occur because (1) a majority of the Technical Specifications will not be applicable with Unit 3 defueled, (2) many Unit 3 systems will be removed from service, and (3) certain Unit 2 design deficiencies have been previously reported for all three units. During the Unit 3 restart activities, identified Unit 3 design deficiencies not previously reported for any BFN unit and those events adversely affecting Unit 3 spent fuel pool cooling, level and chemistry would remain potentially reportable. However, for the few reportable events that occur during the restart activities (e.g., unplanned ESF actuations) or involve previously reported design deficiencies TVA will request a limited exemption from the reporting requirements of 10 CFR 50.72 and 50.73 for the duration of the Unit 3 restart activities, up to fuel load. That limited exemption will be requested by September 14, 1990.

The intended BFN program revisions are described in Enclosure 1. These program changes can be made consistent with NRC regulations and still ensure the protection of the public health and safety.

If there are any questions, please telephone Patrick P. Carrier, BFN Licensing Manager, at (205) 729-3570.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



Mark O. Medford,
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Enclosures
cc: See page 3

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Enclosure 1

PROGRAM REVISIONS

INTRODUCTION

Based on the lessons learned from the Unit 2 restart activities, TVA intends to utilize the results of the Unit 2 design activities, to the extent possible, and minimize repetitive testing of the Unit 3 systems and components. Those Unit 2 design activities expected to be used for Unit 3 include system walkdowns, engineering analyses, and issued drawings, as well as the Unit 2 design packages and procedures where appropriate.

Additionally, the Unit 2 practice of performing an individual post-modification test for each modification has resulted in repetitive testing of components and systems due to the numerous modifications. TVA intends to minimize such repetitive testing by placing emphasis on modifying entire systems, without performing individual postmodification tests. Modified preoperational functional testing of the systems would then be performed at the end of the modification phase of the restart activities.

The following BFN programs, to be discussed with NRC at a future date, will be revised for Unit 3:

- Design Process
- Modification Process
- System Turnover/Acceptance
- Component Testing
- System Preoperational Testing
- Procedure Revision Process

PROGRAM REVISIONS

DESIGN PROCESS

When Unit 3 is being modified to implement the Unit 2 restart design criteria, approved by NRC, safety evaluations are not required. However, TVA will develop a design checklist to review those Unit 3 modifications against the design criteria of Unit 2. The safety evaluation, however, will be performed for any Unit 3 modification that differs from the design criteria of Unit 2 or if the actual plant modification process could affect the concurrent safe operation of Unit 2. This is consistent with TVA procedures and industry guidance, NSAC-125, "Guidelines for 10 CFR 50.59 Safety Evaluations," since Unit 2 will be documented in the BFN updated safety analysis report, and safety evaluations are not required for changes to the facility that establish compliance with the safety analysis report.

MODIFICATION PROCESS

Implementation of modifications will be controlled by workplans. These workplans will specify normal construction testing required to verify proper installation (i.e., continuity tests) to close the modification.

To ensure that the necessary modifications to a system are completed, a Master Tracking System (MTS) will be employed. The MTS is a computerized listing of each open item that could affect the operability of the system such as Maintenance Requests and Condition Adverse to Quality Reports.

SYSTEM TURNOVER/ACCEPTANCE

After the modifications to an individual system are complete, the system will be formally turned over to the plant. Turnover will include a walkdown to review the modifications made to the system. The walkdowns will involve the installing organization and appropriate plant personnel, including the responsible plant system engineer.

COMPONENT TESTING

After system turnover and acceptance by the plant, testing of the modified components will be performed. This testing will verify that the component operates and satisfies its design. Component testing will include such items as motor rotation checks and valve stroke timing.

SYSTEM PREOPERATIONAL TESTING

After the components of a system are tested, TVA will perform a modified preoperational test program. This program will not encompass the complete scope of Regulatory Guide 1.68, "Initial Test Programs for Water-Cooled Nuclear Power Plants." However, this program will include integrated functional system testing of (1) any modified system to ensure that it will perform as designed and (2) any system whose safe operation could be affected by the long-term layup. This testing will be performed at the end of the modification phase of the restart activities.

PROCEDURE REVISION PROCESS

TVA expects that many Unit 3 procedures will be no more than the existing Unit 2 procedures with minor revisions, such as changes to equipment designations. A single safety evaluation will be written to address the Unit 3 procedure revision process. The Unit 3 procedures would be revised, validated and then implemented under the safety evaluation. Any subsequent revisions to the validated Unit 3 procedures would be subject to new safety evaluations.