



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

APR 30 1991

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

Gentlemen:

In the Matter of
Tennessee Valley Authority

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Docket Nos. 50-259
50-260
50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - TVA SUPPLEMENTAL RESPONSE TO GENERIC LETTER (GL) 88-11, NRC POSITION ON RADIATION EMBRITTLEMENT OF REACTOR VESSEL MATERIALS AND ITS IMPACT ON PLANT OPERATIONS

- References:
1. Generic Letter 88-11, dated July 12, 1988, "NRC Position on Radiation Embrittlement of Reactor Vessel Material and Its Impact on Plant Operations"
 2. TVA Response to Generic Letter 88-11, dated November 30, 1988
 3. TVA Supplemental Response to Generic Letter 88-11, dated February 28, 1991

This correspondence provides a change to TVA's schedule for submitting revised pressure-temperature (P-T) limits for BFN Technical Specifications (TS) using the methodology of Revision 2 to Regulatory Guide (RG) 1.99, Radiation Embrittlement of Reactor Vessel Materials.

Reference 1, requested licensees submit a technical analysis and a proposed schedule for action. The GL stated the schedule was negotiable provided actions would be completed within two plant outages after the effective date of Revision 2 to RG 1.99.

Reference 2, provided TVA's response to GL 88-11. The technical analysis concluded that for BFN Units 2 and 3 the current TS are bounding with respect to pressure/temperature limits determined using the RG 1.99, Revision 2 methodology. For BFN Unit 1, the current TS is not bounding with respect to PT limits determined using the Revision 2 methodology. Units 2 and 3 will be bounded by the present TS until approximately ten effective full power years (EFPY), which is expected to carry the units

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through two additional cycles. Units 2 and 3 have more operating margin than Unit 1 because the most limiting weld in those reactor vessels has less copper and nickel content and a lower initial nil-ductility transition temperature.

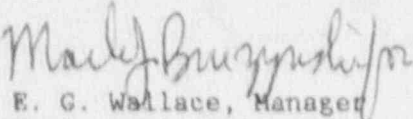
All three BFN units are currently shutdown. Units 1 and 3 are on administrative hold with restart dates to be determined. TVA's response to GL 88-11 committed to submit revisions to the BFN TS by March 1, 1991. At the time of the response to the GL, TVA anticipated restart of Unit 2 in 1989. The GL 88-11 schedule was based on submittal of the TS revision after Unit 2 restart. TVA anticipates Unit 2 will restart in May 1991. Accordingly, the schedule for submittal of these TS revisions is being changed. TVA will submit these TS revisions by October 4, 1991.

This correspondence changes the schedule for an existing commitment. No new commitments are contained in this correspondence.

If you have any questions, please telephone Patrick P. Carrier at (205) 729-3566.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


E. G. Wallace, Manager
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cc: See page 3

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