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FEB 16 1993

U.S. Nuclear Regulatory Commission
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Gentlemen:

In the Matter of)
Tennessee Valley Authority)

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

BROWNS FERRY NUCLEAR PLANT (BFN) - REVISION OF BFN NUCLEAR PERFORMANCE
PLAN (NPP), VOLUME III, REVISION 2, COMMITMENT DATE RELATED TO COMPONENT
AND PIECE-PART QUALIFICATIONS

This letter documents TVA's request for a revision of the completion date for a commitment contained in BFN NPP, Volume III, Revision 2, related to "Component and Piece Part Qualification." As discussed in the NRC and TVA management meeting held on January 8, 1993, it is appropriate to revise the commitment date of September 30, 1993 to September 30, 1994.

By letter dated October 24, 1988, TVA submitted to the NRC staff the BFN NPP, Volume III, Revision 2. In Section 12 of the report, TVA made specific long term commitments regarding component and piece part qualification; however, no specific completion dates were identified. Following the restart of Unit 2, on December 24, 1991, TVA submitted a letter to provide the NRC staff with additional information related to Unit 2 post-restart commitments. In that letter, TVA noted that the post-restart phase of the commitment would be completed by September 30, 1993. That date was predicated on completion of the Unit 3 restart work. At this time, TVA does not expect to complete the Unit 3 restart activities by that date. Accordingly, TVA considers appropriate a revision of the commitment to reflect TVA's current schedule for completing the actions required for the post-restart commitments for this issue.

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The objective of the NPP commitments in this area was to ensure that TVA's procurement program would prevent degradation of previously qualified equipment through the use of spare and replacement parts. To meet this objective, the NPP Volume III commitments were divided into pre-restart and post-restart phases. The pre-restart phase consisted of:

1. Reviewing the plant's maintenance history to identify the activities that have replaced safety related components or items.
2. Performing evaluations of replacement items installed in 10 CFR 50.49 applications.
3. Performing evaluations of the 10 CFR 50.49 inventoried commercial grade spare parts to assure that their subsequent use will not degrade previously qualified equipment.

These tasks were completed in June 1990 and analysis of the results yielded a nonconformance percentage of less than one percent. Specifically, 16 nonconforming items were identified from the review of approximately 226,000 replacement items. TVA's letter dated April 16, 1991 to NRC documents completion of the pre-restart phase for Unit 2. In addition, TVA's letter to NRC dated July 10, 1992 commits to complete these Unit 2 pre-restart tasks for Units 1 and 3 prior to the restart of each respective unit.

The post-restart phase consists of:

1. Performing evaluations of both installed and inventoried items used in non 10 CFR 50.49 safety-related applications.
2. Developing pre-engineered specifications that detail the technical and quality requirements.
3. Establishing a conditional release program.

Items 2 and 3 of the post-restart phase have been completed. The completion date for Item 1 of the post-restart phase is the subject of this letter. Completion of the post-restart items differs from completion of the pre-restart items in that the evaluations, specifications, and program development for the post-restart items applies simultaneously to Units 1, 2, and 3. Therefore, Items 2 and 3 have been completed for all three units at BFN.

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Item 1 requires evaluations to be performed to address installed and inventoried components used in non-10 CFR 50.49 safety-related applications. These evaluations require a detailed review of the associated procurement documentation to ensure the components are qualified for their applications.

As noted above, the September 30, 1993 date for completion of Item 1 of the post-restart phase for Unit 2 was based on the expected restart date for Unit 3. Based on this and on the minimum number of nonconformances identified during the pre-restart phase, TVA concludes that a revision of the date for completion of Item 1 of the post-restart phase would be appropriate and would not result in any safety significant concerns at BFN. Therefore, TVA requests that NRC revise the date for this commitment to September 30, 1994. Additionally, TVA plans to review the results of the ongoing non-10 CFR 50.49 safety-related activities at six-month intervals to assess the effectiveness of the program. TVA will notify NRC of any changes to the program as appropriate.

Sincerely,



O. J. Zeringue

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