

400 Chestnut Street Tower II

January 15, 1980

Director of Nuclear Reactor Regulation  
Attention: Mr. Thomas A. Ippolito, Chief  
Branch No. 3  
Division of Operating Res  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Ippolito:

In the Matter of the ) Docket No. 50-259  
Tennessee Valley Authority )

Enclosed is a partial response to an informal request for additional information from your staff regarding the requested technical specification change for Browns Ferry unit 1 reload 3 submitted by my letter to H. R. Denton dated October 4, 1979 (TVA BFNP TS 131). Enclosure 1 provides answers to those questions which require an answer. As appropriate, the answers provided in Enclosure 1 for Browns Ferry unit 1 are equally applicable to unit 2. Enclosure 2 provides revisions to the unit 1 technical specifications originally submitted by request TVA BFNP TS 131.

We have requested assistance from General Electric on the remainder of the questions and expect their response very soon. Their response will be forwarded to you as soon as possible.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosures

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ENCLOSURE 1

RESPONSE TO NRC REQUEST FOR INFORMATION  
REGARDING BROWNS FERRY UNIT 1 RELOAD 3

Question - Page 97 - Discuss the elimination of reactor low pressure instrumentation surveillance requirements. Provide safety functions of instrumentation.

Response: The subject instrumentation was used only in the loop select logic and was removed as part of the modification that eliminated the loop select logic of the LPCI mode of the RHR system. The surveillance requirement for these instruments on page 97 should have been deleted earlier.

Question - Pages 111 and 182 - Discuss the reason for these changes. Is LPCI loop selection logic eliminated?

Response: The proposed changes on pages 111 and 182 are a result of the elimination of the RHR LPCI loop select logic which has been completed for all units at Browns Ferry.

Question - Page 157 - Recommend require daily HPCI surveillance when RCIC inoperable.

Response: The proposed change was intended only to make the surveillance requirement agree with the Limiting Conditions for operation. The stated surveillance test requirements are fully adequate, and therefore, no further changes are proposed.

Question - Page 160 - It has been our understanding that the power spiking penalty is inherent in the 8x8 fuel LHGR limit. Is this a double accounting of the penalty?

Response: GE to provide answer.

Question - Page 160 - Because of REDY code inaccuracies of RPT response, we have previously required a 3 increase in operating MCPR limits. Provide additional justification for proposed limits or appropriate additional margin.

Response: Until NRC's review of ODYN is complete, TVA's transient analyses will be based on the accepted REDY code. TVA acknowledges that some uncertainty may exist in the ability of REDY to accurately predict pressurization rate in all cases. However, overall, we believe that REDY provides a conservative calculation for the current licensing basis transients. Nevertheless, in order to account for any possible nonconservatisms of REDY, TVA commits to implement a  $\Delta$ CPR penalty of .03 for the pressurization events for EOC-2000 MWd/t.

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The unit 1 cycle 4 operating limit MCPR's should be revised as follows:

7x7 fuel; BOC 4 through EOC 4 :1.23

8x8 fuel; BOC 4 through EOC 4-2000 MWd/t :1.24  
EOC 4-2000 MWd/t through EOC 4 :1.27

8x8R fuel; BOC 4 through EOC 4-2000 MWd/t :1.25  
EOC 4-2000 MWd/t through EOC 4 :1.28

P 8x8R fuel; BOC 4 through EOC 4-2000 MWd/t :1.25  
EOC 4-2000 MWd/t through EOC 4 :1.28

GZ to answer questions concerning NEDO-24209.

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ENCLOSURE 2

REVISIONS TO TECHNICAL SPECIFICATION REQUEST TVA BFNP TS 131  
BROWNS FERRY NUCLEAR PLANT UNIT 1

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