

March 31, 2000

Tennessee Valley Authority  
ATTN: Mr. J. A. Scalice  
Chief Nuclear Officer and  
Executive Vice President  
6A Lookout Place  
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SUBJECT: PLANT PERFORMANCE REVIEW - BROWNS FERRY

The purpose of this letter is to communicate our assessment of your performance and to inform you of our planned inspections at your facility. On February 29, 2000, we completed a Plant Performance Review (PPR) of the Browns Ferry Nuclear Plant (BFNP). We conduct these reviews to develop an integrated overview of the safety performance of each operating nuclear power plant. We use the results of the PPR in planning and allocating inspection resources and as inputs to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from February 1, 1999 through January 31, 2000, but emphasized the last six months to ensure that our assessment reflected your current performance. Our most recent summary of plant performance at BFNP was provided to you in a letter dated October 14, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We plan to begin initial implementation of the revised reactor oversight process industry-wide, including your facility, on April 2, 2000.

This PPR reflects continued process improvements as we make the transition into the revised reactor oversight process. You will notice that the following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we are organizing the results into the strategic performance areas embodied in the revised reactor oversight process. In addition, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with the inspection results in assessing your performance. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

During the last six months, Unit 1 remained in a long-term layup condition with the reactor defueled. Unit 2 operated at or near 100 percent power with the exception of two reactor

scrams. One was a manual reactor scram due to a loss of EHC oil pressure and the second was an automatic scram due to a high water level in the moisture separators. Unit 3 operated at or near 100 percent power for the entire six-month period.

Although the NRC noted some performance issues during this assessment period, we note that Browns Ferry continues to operate in a safe manner. In an effort to ensure that these issues are addressed, additional inspection resources will be allocated in certain areas as noted in this letter and the attached inspection plan.

In the reactor safety strategic performance area, one performance indicator (PI) was white. It involved safety system unavailability of the heat removal system for Unit 3. Specifically, a failure was identified on the Unit 3 reactor core isolation cooling turbine speed sensor connector during the 4<sup>th</sup> quarter of CY 1998. Our inspection results noted and the performance indicators confirmed that, with the exception of the Unit 3 heat removal system unavailability, no significant changes or declining trends were identified. Based on our assessment of your performance in the reactor safety strategic performance area, we plan to perform a supplemental inspection of the corrective actions for the Unit 3 heat removal system unavailability in addition to the inspections under the new baseline inspection program.

We did not identify any significant performance issues in the radiation safety or safeguards strategic performance areas. As a result, only baseline inspections are planned.

The baseline inspection program encompasses both Unit 2 and 3 and the shared operational systems of Unit 1, but does not address the remaining Unit 1 systems in layup. As such, we intend to inspect the applicable Unit 1 layup equipment and activities on an annual basis as described in the attached inspection plan.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were used during this PPR process to arrive at our integrated view of your performance trends. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering, and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The attached PIM includes items summarized from inspection reports or other docketed correspondence regarding Browns Ferry. We did not document all aspects of licensee programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the attached PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2000 through March 2001 at Browns Ferry to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival onsite. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future due to emerging performance issues at Browns Ferry or other Region II facilities. We also included some NRC non-inspection activities in Enclosure 2 for your information. Routine resident inspections are not listed due to their ongoing and continuous nature.

We will inform you of any changes to the inspection plan. If you have any questions, please contact me at (404)-562-4530.

Sincerely,  
*/RA/*

Paul E. Fredrickson, Chief  
Reactor Projects Branch 6  
Division of Reactor Projects

Docket Nos. 50-259, 50-260, 50-296  
License No. DPR-33, DPR-52, DPR-68

Enclosures: 1. Plant Issues Matrix  
2. Inspection Plan

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