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September 15, 2011

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Browns Ferry Nuclear Plant, Units 2 and 3
Facility Operating License Nos. DPR-52 and DPR-68
NRC Docket Nos. 50-260 and 50-296

**Subject: Response to NRC Request for Additional Information Regarding
Technical Specification Change TS-429**

- References:
1. TVA letter to NRC, "Technical Specification Change TS-429 - Deletion of Low Pressure Coolant Injection Motor-Generator Sets for Browns Ferry Nuclear Plant, Units 2 and 3," dated February 25, 2011
 2. NRC letter to TVA, "Browns Ferry Nuclear Plant, Units Nos. 2 and 3 - Request for Additional Information Regarding a Request to Eliminate Low Pressure Coolant Injection Pump Motor Generator Sets (TAC Nos. ME5796 and ME5799)," dated May 27, 2011
 3. NRC e-mail to TVA, "Deletion of Low Pressure Coolant Injection Motor-Generator Sets for Browns Ferry Nuclear Plant [BFN], Units 2 and 3," dated September 8, 2011

On February 25, 2011, the Tennessee Valley Authority (TVA) submitted a Request for Technical Specification Change TS-429 - Deletion of Low Pressure Coolant Injection Motor-Generator Sets for Browns Ferry Nuclear Plant, Units 2 and 3 (Reference 1). On May 27, 2011, the NRC transmitted a Request for Additional Information (RAI) (Reference 2). (Note: The Reference 2 RAI contained a typographical error in one of the TAC numbers noted in the RAI Subject; the correct TAC numbers are included in this response.)

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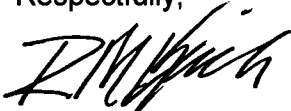
On July 18, 2011, the NRC transmitted draft RAI questions from the Electrical Branch. TVA informed the NRC that no clarification of intent of the questions was necessary.

On September 8, 2011, the NRC transmitted the e-mail message (Reference 3) that noted the NRC staff no longer requires the information requested in the May 27, 2011, RAI. This message also documented the agreement that the TVA response to the electrical RAI questions would be submitted by September 18, 2011.

The Enclosure to this letter provides the TVA's response to the electrical RAI. There is no new regulatory commitment in this RAI response. If you should have any questions regarding this submittal, please contact Tom Matthews at (423) 751-2687.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of September 2011.

Respectfully,



R. M. Krich

Enclosure: TVA Response to NRC Request for Additional Information Questions

cc: NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Browns Ferry Nuclear Plant

ENCLOSURE

Tennessee Valley Authority Browns Ferry Nuclear Plant, Units 1, 2, and 3

Technical Specification Change Request TS-429 – Deletion of Low Pressure Coolant Injection Motor-Generator Sets

TVA Response to NRC Request for Additional Information Questions

NRC Question 1:

On Page E-3 of the license amendment request (LAR), the licensee stated that in a previous amendment for Browns Ferry Nuclear Plant (BFN), Unit 1, the Low Pressure Coolant Injection (LPCI) Motor-Generator (MG) Sets, and their Reactor Motor Operated Valve (RMOV) Boards 1D and 1E were removed from service. For BFN, Unit 1, the loads that were once on RMOV Boards 1D and 1E are now powered from BFN, Unit 1, RMOV Boards 1A and 1B. However, BFN, Units 2 and 3 will retain their RMOV Boards D and E in the proposed modification, which will also eliminate the LPCI MG Sets.

Explain why the RMOV Boards D and E relating to BFN Units 2 and 3 would be retained, whereas RMOV Boards 1D and 1E were eliminated for BFN Unit 1.

TVA Response:

The changes for Unit 1 RMOV Boards D and E were performed in conjunction with the Unit 1 re-start. Since Unit 1 was non-operating, the design approach was to move the Boards 1D and 1E loads to RMOV Boards 1A and 1B. This solution resolved the MG set removal and made Appendix R cable separation improvements.

The design approach for Units 2 and 3 accomplishes the same goals as Unit 1 while making efficient use of available resources.

NRC Question 2:

On Page E-9 of the LAR, the licensee stated that the feeder breakers for the 480 Volt (V) RMOV Boards D and E at the applicable 480V Shutdown Boards will be modified from electrically-operated to mechanically-operated.

Please confirm that the proposed modification described above to the breaker operation is for isolation purposes. Discuss whether similar feeder breakers for 480V RMOV Boards A, B, and C at the applicable 480V Shutdown Boards are also of a mechanically-operated type for isolation purposes. In addition, after the breakers are modified to a mechanically-operated type,

the remote control capability for these breakers would be lost. Please discuss any changes to plant procedures that would be necessary given the loss of remote control capability.

TVA Response:

1. The proposed modification, as described in the question above, is for isolation purposes.
2. The similar 480V Shutdown Board Feeder breakers for Units 2 and 3, 480V RMOV Boards A, B, and C are of a mechanically operated type for isolation purposes.
3. After the breakers are modified to a mechanically operated breaker type, the breakers will be able to be operated locally at the 480V shutdown or the RMOV boards.

Presently, there is no remote control of the MG sets from the Main Control Room, and there is no remote control capability associated with the breakers for the 480V RMOV Boards D and E other than the power-seeking auto-transfer function of the MG sets, which will be deleted by the modification.

Currently, local control is available either at the MG set junction box, or at the RMOV Boards D and E. After the modification, the breaker will no longer be controlled at the MG set junction box, and breaker control at the RMOV Boards D and E will be retained.

Operations procedures will be revised to have the operators operate these breakers locally and to address the deletion of the MG sets and their power-seeking auto-transfer function.