

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION REVISIONS
TVA BFNP TS 176 SUPPLEMENT 9
BROWNS FERRY NUCLEAR PLANT
UNITS 1, 2, AND 3

UNIT 1

6.0 ADMINISTRATIVE CONTROLS

6.8 Minimum Plant Staffing

The minimum plant staffing for monitoring and conduct of operations is as follows.

1. A licensed senior reactor operator shall be present at the site at all times when there is fuel in the reactor.
2. A licensed reactor operator shall be in the control room whenever there is fuel in the reactor.
3. A licensed senior reactor operator or SRO limited to fuel handling shall be in direct charge of a reactor refueling operation; i.e., able to devote full time to the refueling operation.
4. A health physics technician shall be present at the facility at all times there is fuel in the reactor.
5. Two licensed reactor operators shall be in the control room during any cold startups, while shutting down the reactor, and during recovery from unit trip.
6. Either the plant superintendent or an assistant plant superintendent shall have acquired the experience and training normally required for examination by the NRC for a Senior Reactor Operator's License, whether or not the examination is taken. In addition, either the operations supervisor or the assistant operations supervisor shall have an SRO license.
7. A Shift Technical Advisor shall be present at the site at all times.

6.9 Environmental Qualification

- A. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License DPR-33 dated October 24, 1980.
- B. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

UNIT 2

6.0 ADMINISTRATIVE CONTROLS

6.8 Minimum Plant Staffing

The minimum plant staffing for monitoring and conduct of operations is as follows.

1. A licensed senior reactor operator shall be present at the site at all times when there is fuel in the reactor.
2. A licensed reactor operator shall be in the control room whenever there is fuel in the reactor.
3. A licensed senior reactor operator or SRO limited to fuel handling shall be in direct charge of a reactor refueling operation; i.e., able to devote full time to the refueling operation.
4. A health physics technician shall be present at the facility at all times there is fuel in the reactor.
5. Two licensed reactor operators shall be in the control room during any cold startups, while shutting down the reactor, and during recovery from unit trip.
6. Either the plant superintendent or an assistant plant superintendent shall have acquired the experience and training normally required for examination by the NRC for a Senior Reactor Operator's License, whether or not the examination is taken. In addition, either the operations supervisor or the assistant operations supervisor shall have an SRC license.
7. A Shift Technical Advisor shall be present at the site at all times.

6.9 Environmental Qualification

- A. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License DPR-52 dated October 24, 1980.
- B. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

UNIT 3

4.0 ADMINISTRATIVE CONTROLS

4.8 Minimum Plant Staffing

The minimum plant staffing for monitoring and conduct of operations is as follows.

1. A licensed senior reactor operator shall be present at the site at all times when there is fuel in the reactor.
2. A licensed reactor operator shall be in the control room whenever there is fuel in the reactor.
3. A licensed senior reactor operator or SRO limited to fuel handling shall be in direct charge of a reactor refueling operation; i.e., able to devote full time to the refueling operation.
4. A health physics technician shall be present at the facility at all times there is fuel in the reactor.
5. Two licensed reactor operators shall be in the control room during any cold startups, while shutting down the reactor, and during recovery from unit trip.
6. Either the plant superintendent or an assistant plant superintendent shall have acquired the experience and training normally required for examination by the NRC for a Senior Reactor Operator's License, whether or not the examination is taken. In addition, either the operations supervisor or the assistant operations supervisor shall have an SRO license.
7. A Shift Technical Advisor shall be present at the site at all times.

6.9 Environmental Qualification

- A. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License DPR-68 dated October 24, 1980.
- B. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.

ENCLOSURE 2

BROWNS FERRY NUCLEAR PLANT PROPOSED TECHNICAL SPECIFICATIONS FOR
UNITS 1, 2, AND 3

DESCRIPTION AND JUSTIFICATION
(TVA BFNP TS 176 SUPPLEMENT 9)

Sections 6.8.1, 6.8.2, 6.8.3, and 6.8.5 - Add the word "reactor" to standardize with abbreviations SRO and RO.

Section 6.8.3 - Change the words from "A licensed senior operator shall be in direct charge of a refueling operation" to "A licensed senior reactor operator or SRO limited to fuel handling shall be in direct charge of a reactor refueling operation."

Due to staffing requirements and continuing manpower shortages, this proposed revision is needed to allow employees to be trained and licensed as SROs limited to fuel handling as permitted by the standard technical specifications. These proposed technical specifications will permit TVA to utilize personnel after they are trained and licensed and free SROs for other duties.

These proposed changes are routine and administrative in nature since they only involve standardizing language consistent with the wording provided in similar parts of the standard technical specifications.

BROWNS FERRY NUCLEAR PLANT
SIGNIFICANT HAZARDS CONSIDERATION
FOR
PROPOSED TECHNICAL SPECIFICATION CHANGES

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

No - The proposed amendment is administrative in nature since the change only involves standardized language consistent with the wording provided in similar parts of the standard technical specifications. The only change of significance provides for personnel to be trained and licensed as SROs Limited to Fuel Handling in place of having a licensed senior reactor operator in direct charge of refueling operations.

2. Does the proposed amendment create the probability of a new or different kind of accident from any accident previously evaluated?

No - See explanation in (1) above.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

No - See explanation in (1) above.