ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION REVISIONS
TVA BFNP TS 195 SUPPLEMENT 1

TABLE 3.7.A
PRIMARY CONTAINMENT ISOLATION VALVES

Group	Valve Identification	Number of Power Operated Valves Inboard	Outboard	Maximum Operating Time (sec.)	Normal Position	Action on Initiating Signal
1	Main steamline isolation valves (PCV-1-14, 26, 37, & 51; 1-15, 27, 38 & 52)	4	4	3 < T < 5	O	GC
1	Main steamline drain isolation valves (PCV-1-55 & 1-56)	1	1	15	O	GC
1	Reactor Water sample line isolation valves	1	1	5	C	SC
2	RHRS shutdown cooling supply isolation valves (PCV-74-48 & 47)	1	1	40	C	SC
2	RHRS - LPCI to reactor (PCV-74-53 & 67)		2	30	C	SC
2	RHRS flush and drain vent to suppression chamber (PCV-74-102, 103, 119, & 120)		4	20	C	SC
2	Suppression Chamber Drain (PCV-75-57 & 58)		2	15	C	SC
2	Drywell equipment drain discharge isolation valves (PCV-77-15A & 15B)		2	15	O	GC
2	Drywell floor drain discharge isolation valves (PCV-77-2A & 2B)		2	15	O	GC

TABLE 3.7.C

TESTABLE PENETRATIONS WITH TESTABLE BELLOWS

X-7A	-	Primary Steamline	X-11	-	Steamline to HPCI Turbine
X-7B	-	Primary Steamline	X-12	-	RHR Shutdown Supply Line
X-7C	-	Primary Steamline	X-13A	-	RHR Return Line
X-7D	-	Primary Steamline	X-13B	-	RHR Return Line
X-8	-	Primary Steamline Drain	X-14	-	Reactor Water Cleanup Line
X-9A	-	Feedwater Line	X-16A	-	Core Spray Line
X-9B	-	Feedwater Line	X-16B	-	Core Spray Line
X-10	-	Steamline to RCIC Turbine	X-17	-	Blank

TABLE 3.7.F

PRIMARY CONTAINMENT ISOLATION VALVES LOCATED IN
WATER SEALED SEISMIC CLASS 1 LINES

Valve	Valve Identification
74-53	RHR LPCI Discharge
74-54	RHR
74-57	RHR Suppression Chamber Spray
74-58	RHR Suppression Chamber Spray
74-60	RHR Drywell Spray
74-61	RHR Drywell Spray
74-67	RHR LPCI Discharge
74-68	RHR LPCI Discharge
74-71	RHR Suppression Chamber Spray
74-72	RHR Suppression Chamber Spray
74-74	RHR Drywell Spray
74-75	RHR Drywell Spray
75-25	Core Spray Discharge
75-26	Core Spray Discharge
75-53	Core Spray Discharge
75-54	Core Spray Discharge

ENCLOSURE 2
JUSTIFICATION AND SAFETY ANALYSIS
(TVA BFNP TS 195 SUPPLEMENT 1)

The head spray line was designed to remove decay heat and residual heat from the reactor during normal shutdown and cooldown. When the reactor is cooling down, part of the residual heat removal flow may be diverted to a spray nozzle in the reactor head. This spray maintains saturation conditions in the reactor vessel head volume by condensing steam being generated by the hot reactor vessel walls and internals. This operational mode has never been used at Browns Ferry.

The head spray line is provided as an operational option. The head spray is not used in any accident analysis, and no credit is taken for having the head spray line in order to safely shut down the plant in the event of an accident. In fact, this line is isolated on an accident signal. It isolates on reactor low water level, high-drywell pressure, and reactor pressure greater than 100 psig.

By removing the head spray line, the number of possible breach paths from the reactor vessel and from the containment is reduced. This will result in a decrease in the probability of an accident resulting from a pipe break or a breach in primary containment. Since the system is not used for accident mitigation, its removal will not result in an increase in the probability of an accident or the severity of any known accident; therefore, the overall result of removing the head spray line would be an increase in the margin of safety.

ENCLOSURE 3
PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION
BROWNS FERRY NUCLEAR PLANT UNIT 3
(TVA BFNP TS 195 SUPPLEMENT 1)

Description of Change

The proposed amendment would delete the two primary containment isolation valves of the head spray line and revise the description for the penetration to indicate that the line is being capped off. The changes are the result of removing the head spray line from the vessel head to just inside primary containment.

Basis for Proposed No Significant Hazards Consideration Determination

The head spray line was designed to remove decay heat and residual heat from the reactor during normal shutdown and cooldown. When the reactor is cooling down, part of the residual heat removal flow may be diverted to a spray nozzle in the reactor head. This spray maintains saturation conditions in the reactor vessel head volume by condensing steam being generated by the hot reactor vessel walls and internals. This operational mode has never been used at Browns Ferry.

The head spray line is provided as an operational option. The head spray is not used in any accident analysis, and no credit is taken for having the head spray line in order to safely shut down the plant in the event of an accident. In fact, this line is isolated on an accident signal. It isolates on reactor low water level, high-drywell pressure, and reactor pressure greater than 100 psig.

The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated. By removing the head spray line, the number of possible breach paths from the reactor vessel and from the containment is reduced. This will result in a decrease in the probability of an accident. The proposed amendment would not create the possibility of a new or different kind of accident from any previously analyzed since the system is not used for accident mitigation and no credit is taken for it in any accident analysis. Therefore, the overall result of removing the head spray line would be an increase in the margin of safety.

Based on the above analysis, TVA proposes to determine that the proposed amendment doese not involve a significant hazards consideration.