



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609

May 3, 1996

TVA-BFN-TS-352

10 CFR 50.90

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

Gentlemen:

In the Matter of	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
		50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 -  
TECHNICAL SPECIFICATION (TS) 352 - ADMINISTRATIVE CHANGES**

In accordance with the provisions of 10 CFR 50.4 and 50.90, TVA is submitting a request for an amendment (TS-352) to licenses DPR-33, DPR-52, and DPR-68 to change the TSs for Units 1, 2, and 3. The proposed change consists of administrative changes to the TSs for BFN Units 1, 2, and 3.

The proposed change withdraws Amendment 219, Temporary TS 343T, reactor vessel water level instrumentation and Amendment 228, Temporary TS 347T, 250 volt DC control power supply system allowed outage time, both for Unit 2 only.

Other administrative changes correct errors in previous TSs and provide clarification of some requirements to ensure consistent application throughout the specifications.

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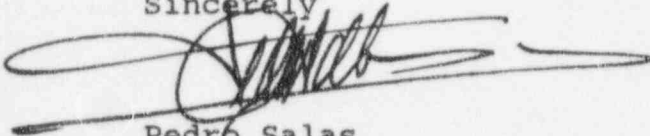
U.S. Nuclear Regulatory Commission  
Page 2  
May 3, 1996

TVA has determined that there are no significant hazards considerations associated with the proposed change and that the change is exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). The BFN Plant Operations Review Committee and the BFN Nuclear Safety Review Board have reviewed this proposed change and determined that operation of BFN Units 1, 2, and 3 in accordance with the proposed change will not endanger the health and safety of the public. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosures to the Alabama State Department of Public Health.

Enclosure 1 to this letter provides the description and evaluation of the proposed change. This includes TVA's determination that the proposed change does not involve a significant hazards consideration, and is exempt from environmental review. Enclosure 2 contains copies of the appropriate TS pages from Units 1, 2, and 3 marked-up to show the proposed change. Enclosure 3 forwards the revised TS pages for Units 1, 2, and 3 which incorporate the proposed change.

TVA requests that the revised TS be made effective within 30 days of NRC approval. If you have any questions regarding this change, please telephone me at (205) 729-2636.

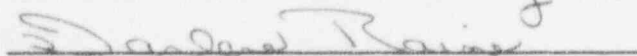
Sincerely,



Pedro Salas  
Manager of Site Licensing

Enclosures  
cc: See page 4

Subscribed and sworn to before me  
on this 3rd day of May 1996.

  
\_\_\_\_\_  
Notary Public

My Commission Expires 4/13/99

REFERENCES:

1. NRC letter to TVA, dated November 12, 1993, Issuance of Technical Specification Amendment to Facilitate Modification of the Reactor Vessel Water Level Instrumentation System to Address Concerns Identified in NRC Bulletin 93-03 Browns Ferry, Unit 2 (TS 343T) (TAC No. M87734)
2. NRC letter to TVA, dated December 7, 1994, Issuance of Technical Specification Amendments For the Browns Ferry Nuclear Plant Unit 2 (TS 347T) (TAC No. M89471)

U.S. Nuclear Regulatory Commission

Page 4

May 3, 1996

Enclosures

cc (Enclosures):

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## ENCLOSURE 1

### TENNESSEE VALLEY AUTHORITY BROWNS FERRY NUCLEAR PLANT (BFN) UNITS 1, 2, AND 3

#### PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-352 DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

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##### I. DESCRIPTION OF THE PROPOSED CHANGE

The proposed change to the Units 1, 2, and 3 TS consists of three parts. Part A deletes TS-343T and Part B deletes TS-347T. These temporary TSs were implemented to support plant modifications. Because the modifications are now in place, TVA is deleting these temporary TSs. Part C revises the Units 1, 2, and 3 TS to make various administrative changes.

**Part A:** This proposed change deletes TS-343T from Unit 2 only. NRC approved the temporary TS change on November 12, 1993. The TS change allowed specific reactor vessel water level instrumentation to be out-of-service in order to perform the reactor vessel water level instrumentation modification requested by NRC Bulletin 93-03. The proposed TS change is described below.

Unit 2, TS page 3.2/4.2-14, Table 3.2.B, Instrument Channel Reactor Low Water Level (LS-3-58A-D) and associated footnote.

Current Minimum Number Operable Per Trip System:

"Only one trip system will be required to be OPERABLE during the period that the Reactor Vessel water level instrumentation modification requested by NRC Bulletin 93-03 is being performed, provided that the reactor is in the COLD SHUTDOWN CONDITION. Manual and automatic initiating capability of CSS and LPCI will be available, but with a reduced number of instrument channels."

Proposed Minimum Number Operable Per Trip System:

The revised specification will delete the asterisk and the footnote from page 3.2/4.2-14.

**Part B:** The proposed change deletes TS-347T. NRC approved the temporary TS change on December 7, 1994. The TS change allowed a temporary extension of the allowed outage time (AOT) from a five-day Limiting Condition for Operation (LCO), to a 45-day LCO, for the 250 volt DC shutdown board control power supply batteries. The AOT allowed system upgrades needed to support Unit 3 operation and replace the system batteries.

1. Unit 2, TS page 3.9/4.9-6, Section 3.9.A.4 and associated footnote.

Current Limiting Condition for Operation:

An asterisk after the specification with a footnote at the bottom of the page reads: "Except as specified in 3.9.B.8.c on page 3.9/4.9-10a from January 1, 1995, to December 31, 1995."

Proposed Limiting Condition for Operation:

The revised specification will delete the asterisk and the footnote from page 3.9/4.9-6.

2. Unit 2, page 3.9/4.9-10a, Section 3.9.B and page 3.9/4.9-10b (blank page).

Current Limiting Condition for Operation:

An asterisk after the specification with a footnote at the bottom of the page reads: "From January 1, 1995, to December 31, 1995, the provisions of Specification 3.9.B.8 on this page will apply while modifications are being performed on the shutdown board batteries and/or their associated battery boards."

Proposed Limiting Condition for Operation:

The revised specification will delete pages 3.9/4.9-10a and 3.9/4.9-10b in their entirety.

3. Unit 2, TS page 3.9/4.9-11, Section 3.9.B.8 and associated footnote.

Current Limiting Condition for Operation:

An Asterisk after the specification with a note at the bottom of the page which reads: "From January 1, 1995, to December 31, 1995, the provisions of Specification 3.9.B.8 on page 3.9/4.9-10a will apply while modifications are being performed on the shutdown board batteries and/or their associated battery boards."



Proposed TS 3.9.B.8 Limiting Condition for Operation:

The revised specification will delete the asterisk and the associated footnote from page 3.9/4.9-11.

**Part C:** This proposed change is administrative in nature. The proposed change includes clarification of some requirements to ensure consistent application throughout the specifications. Further, the proposed change includes a revision based on an NRC Code of Federal Regulations rule change. Also, the proposed change corrects administrative errors in previous TS submittals.

1. Units 1, 2, and 3, TS Table of Contents, page iii, Section 3.8/4.8, Radioactive Materials, Item D., currently reads: "D. Mechanical Vacuum Pump...3.8/4.8-4."

The revised specification will delete 3.8/4.8, Radioactive Materials, Item D., Mechanical Vacuum Pump.

2. Unit 2, TS page 1.0-9, 1.0, Definitions, Item Number 13, Source Check, currently reads: "13. Source Check - Shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source or multiple of sources."

The revised specification will delete Item Number 13 from the Definitions section.

3. Units 1, 2, and 3, TS page 1.0-11, Section 1.0, Definitions, Item KK, currently reads: "Members of the Public - An individual in a controlled or UNRESTRICTED AREA. However, an individual is not a MEMBER OF THE PUBLIC during any period in which the individual receives an occupational dose (as defined in 10 CFR 20)."

The revised specification will read: "Members of the Public - Any individual except when that individual receives an occupational dose (as defined in 10 CFR 20)."

4. Units 1, 2, and 3, TS page 3.2/4.2-9 (Units 1 and 2), and page 3.2./4.2-10 (Unit 3) Table 3.2.A, Primary Containment And Reactor Building Isolation Instrumentation. Remarks section currently shows Group 1 b. initiating logic as "Main Steamline High Radiation."

The revised specification will delete the Group 1 b. remarks.

5. Units 1, 2, and 3, TS pages 3.2/4.2-10, Table 3.2.A, Primary Containment And Reactor Building Isolation Instrumentation, remarks section currently shows Group 1 b. actuation logic as "Main Steamline High Radiation."

The revised specification will delete the Group 1 b. remarks.

## **II. REASON FOR THE PROPOSED CHANGE**

**Part A:** For Unit 2, Amendment 219 dated November 12, 1993, approved temporary changes to Table 3.2.B, Instrumentation That Initiates Or Controls The Core And Containment Cooling Systems, to facilitate a modification of the reactor vessel water level instrumentation system. The purpose of the modification was to eliminate level indication errors caused by dissolved, noncondensable gases in the instrumentation reference legs coming out of solution during plant depressurizations. The modification has been completed and the temporary change is no longer applicable. This is an administrative change to remove the expired temporary requirements from the Technical Specifications, thus restoring the specification to its original condition prior to November 12, 1993.

**Part B:** TVA is revising Limiting Conditions for Operations (LCO) 3.9.B.8 and 3.9.A.4 to remove the temporary changes that were in place while modifications were being performed on the shutdown board batteries and/or their associated battery boards. For Unit 2, Amendment 228 dated December 7, 1994, approved temporary changes to sections 3.9.B.8 and 3.9.A.4, Auxiliary Electrical System LCO, which were annotated with an asterisk. The asterisk informed operators that the temporary AOT was extended from 5 days to 45 days to facilitate modification to each battery board. This modification has been completed and the temporary change is no longer applicable. This is an administrative change to remove expired temporary requirements from the Technical Specifications, thus restoring the specification to its original condition prior to the 250 volt shutdown board battery modification.



**Part C:** TVA is revising items which are administrative in nature in the Table of Contents and correcting administrative errors from previous technical specification revisions. For example, the Main Steamline High Radiation remarks in Table 3.2.A, 1.b., should have been deleted from the TS as part of TS-322. Furthermore, the change provides a revision based on an NRC Code of Federal Regulations (CFR) rule change. In this rule change, 10 CFR 20.1003, changed the definition of "Member of the public" to mean any individual except when that individual is receiving an occupational dose.

### **III. SAFETY ANALYSIS**

**Part A:** The proposed change would remove a temporary change which allowed specific reactor vessel water level instrumentation to be out of service for Unit 2 only, in order to perform the reactor vessel water level instrumentation modification requested by NRC Bulletin 93-03. The modification to the reactor vessel water level instrumentation has been completed, therefore the temporary limiting condition for the minimum number of trip systems operable will no longer be accurate. The Functions, Trip Level Setting, Action and Remarks sections will be as they were prior to November 12, 1993. Therefore, the removal of the temporary change will not affect the safe operation of the plant.

**Part B:** The proposed change would remove a temporary change which permitted operators to extend the allowed outage time from a five-day LCO to a 45-day LCO, while modifications were made to replace the batteries that supply 250 volt DC control power to Units 1 and 2 shutdown boards. The replacement was needed because the batteries were approaching end-of-service life and additional capacity was needed to support Unit 3 operation. The modification to replace the 250 volt DC shutdown board batteries has been completed. Therefore, the temporary LCO for the auxiliary electrical equipment and operation with inoperable equipment will no longer be accurate. The removal of the temporary change will not affect the safe operation of the plant.

**Part C:** These administrative changes do not affect plant operation, design, or any safety-related activity or equipment. Further, it provides revisions based on an NRC Code of Federal Regulations rule change. These changes correct errors and/or improve the clarity of the affected specifications, thereby increasing the probability that the specifications will be interpreted correctly.

#### IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TVA has concluded that operation of BFN Units 1, 2, and 3 in accordance with the proposed change to the TSs does not involve a significant hazards consideration. TVA's conclusion is based on its evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

A. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Part A: The proposed Technical Specification change to remove the temporary revisions, which were in place to modify the reactor vessel water level instrumentation requested by NRC Bulletin 93-03, is administrative. The temporary limiting condition for the minimum number of trip systems operable will no longer be accurate and the minimum number operable per trip system will be the same as they were prior to November 12, 1993. Therefore, the proposed changes will not significantly increase the consequences of an accident previously evaluated.

Part B: The proposed Technical Specification change to remove the temporary revisions, which were in place to replace the 250 volt shutdown board batteries is administrative. The LCO to extend the allowed outage time (AOT) from a five-day to a 45-day AOT will no longer be accurate and the five day AOT will be the same as it was prior to Unit 2, Cycle 7. Therefore, the proposed changes will not significantly increase the consequences of an accident previously evaluated.

Part C: The proposed Technical Specifications change revises items 1 through 5 above (Section I, Description of the Proposed Change, Part C), and is administrative. TVA has evaluated the proposed technical specification changes and has determined that the proposed changes are administrative in nature. Further, it provides a revision based on an NRC Code of Federal Regulations rule change. Also, the proposed changes provide correction of administrative errors from previous technical specifications. For example, the Main Steamline High Radiation remarks in Table 3.2.A, 1.b., should have been deleted from the TS as part of TS-322. It also clarifies some requirements to ensure consistent application throughout the specifications. These changes do not affect any of the design basis accidents. They do not involve an increase in the probability or consequences of an accident previously evaluated.

- B. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Part A: The proposed Technical Specification change to remove the temporary revisions, which were in place to modify the reactor vessel water level instrumentation requested by NRC Bulletin 93-03, is administrative. The temporary limiting condition for the minimum number of trip systems operable will no longer be accurate and the minimum number operable per trip system will be the same as they were prior to November 12, 1993. No modifications to any plant equipment are involved. There are no effects on system interactions made by these changes. They do not create the possibility of a new or different kind of accident from an accident previously evaluated.

Part B: The proposed Technical Specification change to remove the temporary revisions, which were in place to replace the 250 volt shutdown board batteries is administrative. The LCO to extend the allowed outage time (AOT) from a five-day to a 45-day AOT will no longer be accurate and the five day AOT will be the same as it was prior to Unit 2, Cycle 7. No modifications to any plant equipment are involved. There are no effects on system interactions made by these changes. They do not create the possibility of a new or different kind of accident from an accident previously evaluated.

Part C: The proposed Technical Specifications change revises items 1 through 5 above (Section I, Description of the Proposed Change, Part C), and is administrative. TVA has evaluated the proposed changes and has determined that they are administrative in nature. Further, it provides revisions based on an NRC Code of Federal Regulations rule change. It also provides correction of administrative errors in previous technical specification changes. For example, the Main Steamline High Radiation remarks in Table 3.2.A, 1.b., should have been deleted from the TS as part of TS-322. It also clarifies some requirements to ensure consistent application throughout the specifications. These changes do not affect any of the design basis accidents. No modifications to any plant equipment are involved. There are no effects on system interactions made by these changes. They do not create the possibility of a new or different kind of accident from an accident previously evaluated.

C. The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed change is administrative in nature for Parts A, B, and C. The proposed change includes the deletion of temporary changes as a result of modifications to systems and clarification of some requirements to ensure consistent application throughout the specifications. Further, the proposed change corrects errors in previous TS submittals. No safety margins are affected by these changes.

V. ENVIRONMENTAL IMPACT CONSIDERATION

The proposed change does not involve a significant hazards consideration, a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or a significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT (BFN)  
UNITS 1, 2, and 3

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-352  
MARKED PAGES

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I. AFFECTED PAGE LIST

<u>Unit 1</u>	<u>Unit 2</u>	<u>Unit 3</u>
iii	iii	iii
1.0-11	1.0-9	1.0-11
3.2/4.2-9	1.0-11	3.2/4.2-10
3.2/4.2-10	3.2/4.2-9	
	3.2/4.2-10	
	3.2/4.2-14	
	3.9/4.9-6	
	3.9/4.9-10a	
	3.9/4.9-10b	
	3.9/4.9-11	

II. MARKED PAGES

See Attached.

# UNIT 1

MARKED UP PAGES