



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

May 20, 1996

TVA-BFN-TS-373

10 CFR 50.90

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

Gentlemen:

In the Matter of )  
Tennessee Valley Authority )

Docket Nos. 50-259  
50-260  
50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 -  
TECHNICAL SPECIFICATION (TS) CHANGE 373 - GENERIC LETTER (GL)  
87-09 GUIDANCE IMPLEMENTATION**

In accordance with the provisions of 10 CFR 50.4 and 50.90, TVA is submitting a request for an amendment (TS-373) to licenses DPR-33, DPR-52, and DPR-68 to change the TS for Units 1, 2, and 3. The proposed change is a BFN TS Line Item Improvement according to the guidance provided in GL 87-09, Sections 3.0 And 4.0 Of The Standard Technical Specification On The Applicability Of Limiting Conditions For Operation And Surveillance Requirements. The proposed TS wording is in accordance with NUREG 1433, Revision 1, "Standard Technical Specifications in General Electric Boiling Water Reactors (BWR/4)." Specifically, this change revises the BFN surveillance definition 1.0.LL to incorporate a 24-hour delay in implementing the action requirements due to a missed surveillance requirement when the action requirements provide a restoration time that is less than 24 hours. This change also clarifies that the time limit of the action requirements applies from the point in time it is identified a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded.

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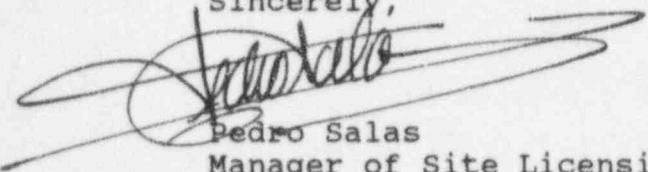
May 20, 1996

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 about this change, please contact me at (205) 729-2636.

Sincerely,



Pedro Salas  
Manager of Site Licensing

Enclosures  
cc: See page 3

Subscribed and sworn to before me  
on this 20th day of MAY 1996.

Barbara A. Blanton  
Notary Public

My Commission Expires My Commission Expires 10/06/98

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Enclosures

cc (Enclosures):

Mr. W. D. Arndt  
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Mr. Johnny Black, Chairman  
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Mr. Mark S. Lesser, Section Chief  
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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-373  
DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

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I. DESCRIPTION OF THE PROPOSED CHANGE

TVA is revising BFN Units 1, 2, and 3 TS definition 1.0.LL to implement the guidance of Generic Letter (GL) 87-09, Sections 3.0 And 4.0 Of The Standard Technical Specification On The Applicability Of Limiting Conditions For Operation And Surveillance Requirements. The proposed change is consistent with GL 87-09 and the proposed TS wording is in accordance with NUREG 1433, Revision 1, "Standard Technical Specifications in General Electric Boiling Water Reactors (BWR/4)." Specifically, this change revises the BFN surveillance definition 1.0.LL to incorporate a 24-hour delay in implementing the Action requirements due to a missed surveillance requirement when the Action requirements provide a restoration time that is less than 24 hours. Additionally, this change also clarifies that the time limit of the Action requirements applies from the point in time it is identified a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded.

The specific changes are described below:

1. Units 1, 2, and 3 TS Surveillance definition 1.0.LL, TS pages 1.0-11.

Paragraph 1.0.LL currently reads:

"Surveillance - Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual limiting conditions for operation unless otherwise stated in an individual Surveillance Requirements. Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval. It is not intended that this (extension) provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillance that are not performed during refueling outages.

Performances of a Surveillance Requirement within the specified time interval shall constitute

compliance and OPERABILITY requirements for a limiting condition for operation and associated action statements unless otherwise required by these specifications. Surveillance Requirements do not have to be performed on inoperable equipment."

The proposed change to TS definition 1.0.LL adds a third and Fourth paragraph to read:

"Surveillance - Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual limiting conditions for operation unless otherwise stated in an individual Surveillance Requirements. Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval. It is not intended that this (extension) provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages.

Performance of a Surveillance Requirement within the specified time interval shall constitute compliance and OPERABILITY requirements for a limiting condition for operation and associated action statements unless otherwise required by these specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

If it is discovered that a surveillance was not performed within its specified frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable condition(s) must be entered.

When the surveillance is performed within the delay period and the surveillance is not met, the LCO must immediately be declared not met, and the applicable condition(s) must be entered."



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

The proposed change will make BFN's TS consistent with the guidance provided in GL 87-09 and the proposed TS wording in accordance with NUREG 1433, Revision 1. BFN's current TSs do not contain provisions similar to GL 87-09. Specifically, GL 87-09 allows the flexibility to defer declaring effected equipment inoperable or an effected variable outside the specified limits when a surveillance has not been completed within the specified frequency.

GL 87-09 allows a delay period of up to 24 hours from the point in time that it is discovered that the surveillance has not been performed and not at the time that the specified frequency was not met. This delay time allows adequate time to complete surveillances that have been missed and permits completion of the surveillances before complying with required actions or other remedial measures that might preclude completion of the surveillances.

## **III. SAFETY ANALYSIS**

In GL 87-09, NRC stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. Because the vast majority of surveillances demonstrate that systems or components in fact are operable. In addition, NRC stated that the allowable outage time limits of some Action requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply. GL 87-09 provides a 24-hour time limit for a missed surveillance. This time limit allows a delay of the required Actions to permit the performance of the missed surveillance.

The time limit is based on considerations of plant conditions, adequate planning, availability of personnel, the time required to performed the surveillance requirement, as well as the safety significance of the delay in completing the surveillance requirement. GL 87-09 concludes that the 24-hour time limit adequately balances the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a plant shutdown to comply with Action statements before the surveillance can be completed.

## **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 technical specifications do 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.

The proposed amendment to TS definition 1.0.LL is in accordance with the guidance of GL 87-09 and NUREG 1433, Revision 1. The proposed change will allow BFN to continue operation for an additional 24 hours after discovery of a missed surveillance. The change being proposed does not affect the precursor for any accident or transient analyzed in Chapter 14 of the BFN Updated Final Safety Analysis Report. The proposed change does not reflect a revision to the physical design and/or operation of the plant. Therefore, operation of the facility in accordance with the proposed change does not affect 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.

The proposed amendment to TS definition 1.0.LL is in accordance with the guidance of GL 87-09 and NUREG 1433, Revision 1. The proposed change will allow the plant to continue operation for an additional 24 hours after discovery of a missed surveillance. The change being proposed will not change the physical plant or the modes of operation defined in the facility license. The change does not involve the addition or modification of equipment, nor do they alter the design or operation of plant systems. Therefore, operation of the facility in accordance with the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed amendment to TS definition 1.0.LL is in accordance with the guidance of GL 87-09 and NUREG 1433, Revision 1. The proposed change does not affect plant safety analysis or change the physical design or operation of the plant. The proposed change will allow the plant up to 24 hours to perform a missed surveillance. The overall effect is a net gain in plant safety by avoiding unnecessary shutdowns and the associate system transients due to missed

surveillance. Therefore, operation of the facility in accordance with the proposed change does not involve a significant reduction in a margin of safety.

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.