

June 27, 1985

Docket Nos. 50-259/260/296

Mr. Hugh G. Parris
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Dear Mr. Parris:

SUBJECT: NRC COMMENTS ON TECHNICAL SPECIFICATIONS AMENDMENT REQUEST

Re: Browns Ferry Nuclear Plant, Units 1, 2 and 3

By letter dated September 27, 1984 you requested Technical Specifications amendments relating to reorganization. The staff has comments which it requests you take into consideration. We will not be able to approve your application until these concerns are addressed.

The comments are attached as Enclosure 1. Please advise us of your intentions.

Sincerely,

Original signed by/

Domenic B. Vassallo, Chief
Operating Reactor Branch #2
Division of Licensing

Enclosure:
As stated

cc w/enclosure:
See next page

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Browns Ferry Nuclear Plant

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NRC Comments on TVA Amendment Request

Dated September 27, 1984

Browns Ferry Technical Specifications

1. Section 6.1.B. This section refers to a Figure which shows the offsite organization of TVA.

We find the revised organization acceptable as it meets the acceptance criteria of Section 13.1.1 of NUREG-0800, the Standard Review Plan. However, we recommend that the proposed Figure be expanded to show the function block of Manager-Radiological Health reporting to the Director of Nuclear Services, with a footnote that the Manager-Radiological Health is responsible for radiological monitoring and dose calculation. This recommendation is consistent with current practice and would make this figure consistent with a second figure which depicts the site organization, and with the proposed Watts Bar Technical Specifications.

2. Section 6.1.c This section refers to a figure which shows the site organization for the operation of Browns Ferry. This organization has been revised under the new position of Site Director.

We find this revised organizational structure acceptable as it meets the acceptance criteria of Section 13.1.2 of NUREG-0800 (the Standard Review Plan). However, we recommend that the proposed Figure be expanded to show the reporting responsibility of the Health Physics Supervisor as is proposed for the corresponding Watts Bar Technical Specifications.

3. Section 6.2.A.3 TVA has revised its provisions for the independent review of operational activities. This revision abolishes the Nuclear Safety Review Board (NSRB) and establishes a full time Nuclear Safety Staff (NSS). The NSS has the same responsibilities previously held by the NSRB.

We find this change acceptable as it meets the acceptance criteria of Section 13.4 of NUREG-0800 (the Standard Review Plan). However, we suggest an expansion of Section 6.2.A.3 to include a commitment that a list of TVA personnel, designated as reviewers by the Chief, NSS, be established and maintained. This statement has been agreed to by TVA for inclusion into the Watts Bar Technical Specifications.

4. Section 6.2.B.6 The proposed requirement omits a description of distribution of PORC records. The following statement should be added to the sentence on records to reestablish the PORC record distribution requirements: "with copies sent to the Site Director, BFNP and the Chief, NSS."

5. Figure 6.3-1 It is proposed to delete Figure 6.3-1 which shows the "In-Plant Fire Program Organization." Since Browns Ferry does not have Standard Technical Specifications, this would delete all reference to the fire protection organization and responsibilities. Therefore, we recommend that Figure 6.1-1 and Figure 6.1-2 be revised to show responsibilities for the Browns Ferry fire protection program and a new subsection to Section 6.1 be added that states: "A site Fire Brigade of at least five members shall be maintained on site at all times. The fire Brigade shall not include the Shift Engineer and the other members of the minimum shift crew necessary for safe shutdown of the unit, nor any personnel required for other essential functions during a fire emergency." (The quoted words are a modified version of the wording in the Standard Technical Specifications.)
6. Section 6.4 As part of this rewrite, the specification relating to the distribution of reportable event reports would be deleted. We recommend that a statement be included requiring distribution of copies of all such reports to the Manager of Nuclear Power, Site Director BFNP, and the Chief, NSS.
7. Section 6.8
 - A. No changes to Section 6.8 (Minimum Plant Staffing) or Table 6.8.A have been proposed. However, the minimum staffing shown in these specifications does not, in some respects, meet that described in 10 CFR 50.54(m)(2) and the interim Required Shift Staffing table of Task Action Plan item I.A.1.3. Table 6.8.A should be revised as indicated in the attachment.
 - B. Section 6.8.2 should include a statement that says: "In addition, a person holding a senior operator license shall be in the control room for that unit whenever it is in an operational mode other than cold shutdown or refueling."
 - C. Section 6.8.3 should be reworded to clarify the requirement for a senior licensed operator in respect to fuel handling as required by 10 CFR 50.54(m)(2). The requirement should state: "A person holding a senior operator license or a senior operator license limited to fuel handling shall be present during alteration of the core (including fuel loading or transfer) to directly supervise the activity and during this time shall not be assigned other duties."

TABLE 6.8.A

<u>Minimum Shift Crew Requirements</u> <u>Shift Position</u>	<u>Units in Operation</u>			<u>Type of License</u>
	<u>1</u>	<u>2</u>	<u>3</u>	
Shift Engineers (SE)	1	1	1	SRO
Assistant Shift Engineers (ASE)	1	2 ³	2	SRO
Licensed Reactor Operators ¹	3	3	3	RO
Unit Operators (UO)	1	2 ³	2	RO
Assistant Unit Operators (AUO)	4	5	5	None
Shift Technical Advisors	1	1	1	None ²
Health Physics Technician	<u>1</u>	<u>1</u>	<u>1</u>	None
Minimum Shift Crew	12	15/13 ³	15	

Notes: SRO - Senior Reactor Operator
RO - Reactor Operator

Note for Table 6.8.A

- 1 This position is normally filled by an assistant shift engineer, but as a minimum it may be filled by a licensed reactor operator. When the incumbent is not a senior reactor operator, he shall not be assigned duties requiring him to direct licensed activities of reactor operators.
- 2 The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and transient and accident response and analysis.
- 3 The number of required licensed personnel when the operating nuclear power units are controlled from a common control room are two senior operators and four operators.