December 12, 1986

Dockets Nos. 50-259/260/296

Manager, Office of Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Sir:

SUBJECT: BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, and 3

Re: Error in Amendments Nos. 129, 124, and 100

By letter dated August 19, 1986, we transmitted amendments Nos. 129, 124, and 100 respectively for the Browns Ferry Nuclear Plant, Units 1, 2, and 3. The Safety Evaluation enclosed referred to section 4.6.4.2 being removed from the Technical Specifications. Section 4.6.4.2 was not requested to be removed, nor was it removed. The Safety Evaluation has been corrected and the corrected version is enclosed.

In addition, Amemdments 129, 124, and 100 inadvertently removed information from pages 185, 185, and 198 for Units 1, 2, and 3 respectively. Item 6.H in amendment 129, p. 185, item 4.6.H in amendment 124, p. 185 and item 4.6.H in amendment 100, p. 196 refers to BF SI 4.6.H. These pages should each read "BF SI 4.6.H-1 and -2" as was approved by Amendments 128, 123, and 99 issued on March 31, 1986. Corrected pages are enclosed.

Sincerely,

Original signed by

Marshall Grotenhuis, Project Manager
BWR Project Directorate #2
Division of BWR Licensing

Enclosure:
As stated

cc w/enclosure:
See next page

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DBL:PD#2	DBL:PD#2	DBL:PD#2	DBL:PD#2
SNorris	MGrotenhuis:cb	GGears	DMuller
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Manager of Nuclear Power
Tennessee Valley Authority

cc:
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Units 1, 2, and 3

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 129 TO FACILITY OPERATING LICENSE NO. DPR-33

AMENDMENT NO. 124 TO FACILITY OPERATING LICENSE NO. DPR-52

AMENDMENT NO. 100 TO FACILITY OPERATING LICENSE NO. DPR-68

TENNESSEE VALLEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2 AND 3

DOCKET NOS. 50-259, 50-260 AND 50-296

1.0 INTRODUCTION

By letter dated February 12, 1986 (TVA BFNP TS-217), the Tennessee Valley Authority (the licensee or TVA) requested amendments to Facility Operating License Nos. DPR-33, DPR-52 and DPR-68 for the Browns Ferry Nuclear Plant, Units 1, 2 and 3. The proposed amendments would change the Technical Specifications to clarify the limiting conditions for operation regarding seismic restraints, supports and snubbers.

2.0 EVALUATION

The proposed amendments clarify the requirements for seismic restraints, supports, and snubbers by adopting the requirements of the Standard Technical Specifications. This would permit the plant, during all modes of operation, to replace or restore inoperable seismic restraints, supports, and snubbers within a 72-hour period of time after they were discovered. It also requires an engineering analysis to show that the supported component(s) has not been damaged by the inoperable snubber(s). Since this is a provision in the Standard Technical Specifications, the addition of this requirement is acceptable.

As noted above, the revised Technical Specifications would permit a unit to startup with an inoperable seismic restraint, support or snubber (SRSS), which is consistent with the BWR Standard Technical Specifications (NUREG-0123). At a glance, this might seem to be at variance with the long standing compliance-based policy that any plant repairs should be completed before a plant starts up, even though some period of time might be allowed to fix the item if it becomes non-functional during operation. (For SRSSs, this period of time is 72 hours). If a SRSS is inoperable, it technically renders the system it is protecting inoperable. The Browns Ferry Technical Specifications (TS) contain specific restrictions on what systems must be operable prior to startup. For example, Section 3.5.A.1 of the TS on the core spray system (CSS) states: "The CSS shall be operable prior to startup from a cold condition." If a SRSS on the CSS were inoperable, the unit could not startup until the SRSS was repaired. As TVA stated in the justification for the proposed change to the TS in the submittal of February 12, 1986, "instances of starting the reactor prior to completing a SRSS repair would rarely occur" because of the present restrictions in the TS on what systems (vs specific components of these systems) must be operable prior to startup. The proposed revisions to the TS is not inconsistent with having plants ready for sustained operation before startup from a shutdown condition and is acceptable.

3.0 ENVIRONMENTAL CONSIDERATIONS

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there should be no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR §51.22(c)(9). Pursuant to 10 CFR §51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: H. Shaw, R. Clark

Dated: August 19, 1986

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.6 PRIMARY SYSTEM BOUNDARY	4.6 PRIMARY SYSTEM BOUNDARY
H. Seismic Restraints, Supports, and Snubbers	H. Seismic Restraints, Supports, and Snubbers
During all modes of operation, all seismic restraints, snubbers, and supports shall be operable except as noted in 3.6.H.1. All safety-related snubbers are listed in Surveillance Instruction BF SI 4.6.H.	The surveillance requirements of paragraph 4.6.G are the only requirements that apply to any seismic restraint or support other than snubbers. Each safety-related snubber shall be demonstrated OPERABLE BY performance of the following augumented inservice inspection program and the requirements of Specification 3.6.H/4.6.H. These snubbers are listed in Surveillance Instructions BF SI 4.6.H-1 and -2.
1. With one or more seismic restraint, support, or snubber inoperable on a system that is required to be operable in the current plant condition, within 72 hours replace or restore the inoperable seismic restraint(s), support(s), or snubber(s) to operable status and perform an engineering evaluation on the attached component or declare the attached system inoperable and follow the appropriate Limiting Condition statement for that system.	1. Inspection Groups The snubbers may be categorized into two major groups based on whether the snubbers are accessible or inaccessible during reactor operation. These major groups may be further subdivided into groups based on design, environment, or other features which may be expected to affect the operability of the snubbers within the group. Each group may be inspected independently in accordance with 4.6.H.2 through 4.6.H.9.
	2. Visual Inspection, Schedule, and Lot Size The first inservice visual inspection of snubbers not previously included in these technical specifications and whose visual inspection has not been performed and documented previously, shall be performed within six months for accessible snubbers and before resuming power after the first refueling outage

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