

June 19, 1995

Mr. Oliver D. Kingsley, Jr.  
President, TVA Nuclear and  
Chief Nuclear Officer  
Tennessee Valley Authority  
6A Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

SUBJECT: ISSUANCE OF TECHNICAL SPECIFICATION AMENDMENTS FOR THE  
BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3  
(TAC NOS. M90921, M90922 AND M90923) (TS 350)

Dear Mr. Kingsley:

The Commission has issued the enclosed Amendment Nos. 221, 236, and 195 to Facility Operating Licenses Nos. DPR-33, DPR-52, and DPR-68 for the Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3, respectively. These amendments are in response to your application dated November 15, 1994, which was superseded by letter dated March 7, 1995.

The amendments remove the frequencies specified in the Technical Specifications for performing audits and delete the requirement to perform the Radiological Emergency Plan, Physical Security Plan, and Safeguard Contingency Plan reviews.

As indicated by letter dated April 14, 1995, from Albert F. Gibson to the Tennessee Valley Authority, Region II has reviewed the changes to your Quality Assurance Program related to these amendments and found them to be acceptable. A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY:

Joseph F. Williams, Project Manager  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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

- Enclosures: 1. Amendment No. 221 to License No. DPR-33
- 2. Amendment No. 236 to License No. DPR-52
- 3. Amendment No. 195 to License No. DPR-68
- 4. Safety Evaluation

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cc w/enclosures: See next page

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OFFICE	PDII-3/LA	E	PDII-3/PM	E	HHFB	N	TQMB	E	TERB
NAME	BClayton		JWilliams		CThomas		SBlair		CMiller
DATE	05/5/95		05/15/95		05/16/95		05/22/95		05/22/95
OFFICE	OTSB #45-109	E	TSGB		RII/DRS	N	OGC		PDII-3/D
NAME	CGrimes		LCunningham		AGibson (telcom)				FHebdon
DATE	05/2/95		05/30/95		06/6/95		06/7/95		6/05/95

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P PDR

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FO-11

Mr. Oliver D. Kingsley, Jr.  
Tennessee Valley Authority

**BROWNS FERRY NUCLEAR PLANT**

cc:

Mr. O. J. Zeringue, Sr. Vice President  
Nuclear Operations  
Tennessee Valley Authority  
3B Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Mr. Pedro Salas  
Site Licensing Manager  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35602

Dr. Mark O. Medford, Vice President  
Engineering & Technical Services  
Tennessee Valley Authority  
3B Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

TVA Representative  
Tennessee Valley Authority  
11921 Rockville Pike, Suite 402  
Rockville, MD 20852

Mr. D. E. Nunn, Vice President  
New Plant Completion  
Tennessee Valley Authority  
3B Lookout Place  
1101 Market Street  
Chattanooga, TN 37402-2801

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW., Suite 2900  
Atlanta, GA 30323

Mr. R. D. Machon, Site Vice President  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35602

Mr. Leonard D. Wert  
Senior Resident Inspector  
Browns Ferry Nuclear Plant  
U.S. Nuclear Regulatory Commission  
10833 Shaw Road  
Athens, AL 35611

General Counsel  
Tennessee Valley Authority  
ET 11H  
400 West Summit Hill Drive  
Knoxville, TN 37902

Chairman  
Limestone County Commission  
310 West Washington Street  
Athens, AL 35611

Mr. P. P. Carrier, Manager  
Corporate Licensing  
Tennessee Valley Authority  
4G Blue Ridge  
1101 Market Street  
Chattanooga, TN 37402-2801

State Health Officer  
Alabama Department of Public Health  
434 Monroe Street  
Montgomery, AL 36130-1701

Mr. T. D. Shriver  
Nuclear Assurance and Licensing  
Browns Ferry Nuclear Plant  
Tennessee Valley Authority  
P.O. Box 2000  
Decatur, AL 35602



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-259

BROWNS FERRY NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 221  
License No. DPR-33

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Tennessee Valley Authority (the licensee) dated November 15, 1994, which was superseded by letter dated March 7, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-33 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 221, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance, to be implemented within 45 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebdon, Director  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: June 19, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 221

FACILITY OPERATING LICENSE NO. DPR-33

DOCKET NO. 50-259

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. \*Overleaf pages are provided to maintain document completeness.

REMOVE

6.0-13  
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INSERT

6.0-13\*  
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JUN 30 1988

REVIEW

6.5.2.7 The NSRB shall review:

- a. The safety evaluations for: (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications or this Operating License.
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All Reportable Events
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

**AUDITS**

**6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:**

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions. †
- b. The performance, training and qualifications of the entire plant staff. †
- c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems or method of operation that affect nuclear safety. †
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50. †
- e. (Deleted) †
- f. (Deleted) †
- g. Any other area of site operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.
- h. The fire protection programmatic controls including the implementing procedures at least once per 24 months.

- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite license personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring program and the results thereof. †
- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975. †
- m. (Deleted) †
- n. The Offsite Dose Calculation Manual and implementing procedures. †
- o. The Process Control Program and implementing procedures for solidification of wet radioactive wastes. †
- p. (Deleted)



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**AUTHORITY**

6.5.2.9 The NSRB shall report to and advise the Senior Vice President, Nuclear Power on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

**RECORDS**

6.5.2.10 Reports of activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power and to the management positions responsible for the areas audited within 30 days after completion of the audit.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-260

BROWNS FERRY NUCLEAR PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 236  
License No. DPR-52

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Tennessee Valley Authority (the licensee) dated November 15, 1994, which was superseded by letter dated March 7, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

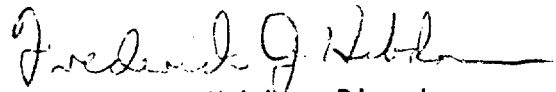
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-52 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 236, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance, to be implemented within 45 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebbon, Director  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: June 19, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 236

FACILITY OPERATING LICENSE NO. DPR-52

DOCKET NO. 50-260

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. \*Overleaf pages are provided to maintain document completeness.

REMOVE

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INSERT

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## 6.5.2.7 The NSRB shall review:

- a. The safety evaluations for: (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications or this Operating License.
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All Reportable Events
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

## AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions. †
- b. The performance, training and qualifications of the entire plant staff. †
- c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems or method of operation that affect nuclear safety. †
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50. †
- e. (Deleted) †
- f. (Deleted) †
- g. Any other area of site operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.
- h. The fire protection programmatic controls including the implementing procedures at least once per 24 months.

- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite license personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring program and the results thereof. †
- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975. †
- m. (Deleted) †
- n. The Offsite Dose Calculation Manual and implementing procedures. †
- o. The Process Control Program and implementing procedures for solidification of wet radioactive wastes. †
- p. (Deleted)

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**AUTHORITY**

6.5.2.9 The NSRB shall report to and advise the Senior Vice President, Nuclear Power on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

**RECORDS**

6.5.2.10 Reports of activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power and to the management positions responsible for the areas audited within 30 days after completion of the audit.





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-296

BROWNS FERRY NUCLEAR PLANT, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.195  
License No. DPR-68

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Tennessee Valley Authority (the licensee) dated November 15, 1994, which was superseded by letter dated March 7, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

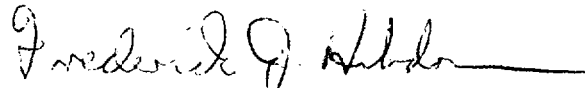
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-68 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 195, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Frederick J. Hebdon, Director  
Project Directorate II-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: June 19, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 195

FACILITY OPERATING LICENSE NO. DPR-68

DOCKET NO. 50-296

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. \*Overleaf pages are provided to maintain document completeness.

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## 6.5.2.7 The NSRB shall review:

- a. The safety evaluations for: (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- d. Proposed changes to Technical Specifications or this Operating License.
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All Reportable Events
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

## AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions. †
- b. The performance, training and qualifications of the entire plant staff. †
- c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems or method of operation that affect nuclear safety. †
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50. †
- e. (Deleted) †
- f. (Deleted) †
- g. Any other area of site operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.
- h. The fire protection programmatic controls including the implementing procedures at least once per 24 months.

- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite license personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring program and the results thereof. †
- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975. †
- m. (Deleted) †
- n. The Offsite Dose Calculation Manual and implementing procedures. †
- o. The Process Control Program and implementing procedures for solidification of wet radioactive wastes. †
- p. (Deleted)

**JUN 30 1988**

**AUTHORITY**

6.5.2.9 The NSRB shall report to and advise the Senior Vice President, Nuclear Power on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

**RECORDS**

6.5.2.10 Reports of activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power and to the management positions responsible for the areas audited within 30 days after completion of the audit.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 221 TO FACILITY OPERATING LICENSE NO. DPR-33

AMENDMENT NO. 236 TO FACILITY OPERATING LICENSE NO. DPR-52

AMENDMENT NO. 195 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 application dated November 15, 1994, which was superseded by letter dated March 7, 1995, the Tennessee Valley Authority (TVA or the licensee) proposed an amendment to the Technical Specifications (TS) for Browns Ferry Nuclear Plant (BFN) Units 1, 2 and 3. The requested changes would remove certain audit frequencies specified in the Administrative Controls section of the TS, but retain the requirement to perform the audits at a frequency to be specified in changes to the Nuclear Quality Assurance (NQA) plan. Changes to the NQA plan were also submitted for review. In addition, the amendment would relocate requirements to perform Radiological Emergency Plan (REP), Physical Security Plan and Safeguards Contingency Plan audits from the TS to the respective plans in accordance with the guidance in Generic Letter (GL) 93-07.

Specific TS changes that were proposed are:

ADMINISTRATIVE CONTROLS 6.5.2.8.a, 6.5.2.8.b, 6.5.2.8.k, and 6.5.2.8.n to delete the phrase "at least once per 12 months."

ADMINISTRATIVE CONTROL 6.5.2.8.l to delete the phrase "at least once every 12 months."

ADMINISTRATIVE CONTROL 6.5.2.8.c to delete the phrase "at least once per 6 months."

ADMINISTRATIVE CONTROLS 6.5.2.8.d and 6.5.2.8.o to delete the phrase "at least once per 24 months."

ADMINISTRATIVE CONTROLS 6.5.2.8.e, 6.5.2.8.f and 6.5.2.8.m would be deleted to remove the TS requirements for these audits (Radiological Emergency Plan, Physical Security Plan, and Safeguards Contingency Plan).



## 2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TS to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies §182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled documents, consistent with the standard enunciated in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether a particular matter is required to be included in the TS, as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.<sup>1</sup> As a result, existing TS requirements which fall within or satisfy any of the criteria in the Final

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<sup>1</sup>The Commission recently promulgated a proposed change to 10 CFR 50.36, pursuant to which the rule would be amended to codify and incorporate these criteria (59 FR 48180). The Commission's Final Policy Statement specified that only limiting conditions for Reactor Core Isolation Cooling, Isolation Condenser, Residual Heat removal, Standby Liquid Control, and Recirculation Pump Trip, meet the guidance for inclusion in the TS under Criterion 4 (58 FR 39137). The Commission has solicited public comments on the scope of Criterion 4, in the pending rulemaking.

Policy Statement must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

### 3.0 EVALUATION

#### 3.1 Other TS-Required Audits

The licensee has proposed that the review and audit functions specified in existing TS 6.5.2.8.a, 6.5.2.8.b, 6.5.2.8.c, and 6.5.2.8.d, 6.5.2.8.k, 6.5.2.8.l, 6.5.2.8.n, and 6.5.2.8.o, be removed from the TS on the basis that they are adequately controlled elsewhere. These TS provisions are not necessary to assure safe operation of the facility, given the requirements in the Quality Assurance Program implementing 10 CFR 50.54 and 10 CFR Part 50, Appendix B to control the requirements for all review and audit functions. Such an approach would result in an equivalent level of regulatory authority while providing for a more appropriate change control process. The level of safety of plant operation is unaffected by this change and NRC and licensee resources associated with processing license amendments to this administrative control may be used more effectively. In addition, audit requirements are specified in the QA program description to satisfy 10 CFR 50, Appendix B, Criterion XVIII. Audits are also covered by ANSI N18.7, ANSI N45.2, 10 CFR 50.54(p), 10 CFR 50.54(t), and 10 CFR Part 73. Therefore, duplication of these requirements does not enhance the level of safety of the plant, nor are the provisions relating to audits necessary to assure safe operation of the facility.

On this basis, the staff concludes that the audit requirements do not need to be controlled by TS, and changes to the audit frequencies, which are described in a change to the Browns Ferry NQA Plan specifying that the audits listed in the TS would be accomplished on a biennial (2 year) frequency as defined in the NQA Plan Section 12.2.E.2, will be adequately controlled by 10 CFR 50.54(a). The staff has concluded, therefore, that relocation of the audit requirements described above is acceptable because (1) their inclusion in TS is not specifically required by §182a of the Act or by 10 CFR 50.36 or other regulations, (2) the audit requirements are not required to avert an immediate threat to the public health and safety, and (3) changes to these audit requirements, as described in the applicable program description, will require prior NRC approval in accordance with 10 CFR 50.54(a). The licensee also proposed changes to the licensee's Nuclear Quality Assurance Plan and justification for the changes that would be necessary to implement the TS changes. NRC Region II has reviewed these changes and has found them to be acceptable.

#### 3.2 Radiological Emergency Plan and Physical Security Plan and Safeguards Contingency Plan Audits

The requirements for reviews and annual audits of the site Radiological Emergency Plan and Physical Security/Contingency Plan (and their associated implementing procedures) are currently delineated in the Radiological Emergency Plan and the Physical Security/Contingency Plan for the Browns Ferry Nuclear Plant. Changes in these review requirements must be made in

accordance with 10 CFR 50.54(p) for the Security Plan and 10 CFR 50.54(q) for the Emergency Plan.

The staff concludes that the requirements for emergency planning in 10 CFR 50.47, 10 CFR 50.54, and 10 CFR Part 50 Appendix E, and for security in 10 CFR 50.54 and 10 CFR 73.55, for drills, exercises, testing, and maintenance of the program, provide adequate assurance that the objective of the previous TS for a periodic review of the program and changes to the programs will be met. Therefore, duplication of the requirements contained in the regulations would not enhance the level of safety for the facility. The staff concludes that other regulatory requirements provide sufficient control of these provisions and removing them from the TS is acceptable.

On this basis, the staff concludes that these requirements do not need to be controlled by TS, and changes to the audit frequencies, which are described in the respective Plans, will be adequately controlled by 10 CFR 50.54(p) or (q), as applicable. The staff has concluded, therefore, that removal of the audit requirements described above is acceptable because (1) their inclusion in the TS is not specifically required by §182a of the Act, or by 10 CFR 50.36 or other regulations, (2) the audit requirements are not required to avert an immediate threat to the public health and safety, and (3) changes to these audit requirements, as described in the applicable program description, will require prior NRC approval in accordance with Appendix E to 10 CFR Part 50, 10 CFR 50.54(p), or 10 CFR 73.55(g).

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Alabama State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments involve changes to the administrative procedures or requirements. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 16202). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 5.0 CONCLUSION

The Commission has 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: David E. LaBarge

Dated: June 19, 1995