

August 29, 1995

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

SUBJECT: ISSUANCE OF TECHNICAL SPECIFICATION AMENDMENTS FOR THE BROWNS FERRY
NUCLEAR PLANT UNITS 1, 2, AND 3 (TAC NOS. M92315, M92316, AND
M92317) (TS 359)

Dear Mr. Kingsley:

The Commission has issued the enclosed Amendment Nos. 223, 238, and 197 to
Facility Operating License 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 May 11, 1995, and supplemented on
June 30, 1995. The amendments provide for the addition of a reactor trip on
low scram pilot air header pressure for BFN Unit 3, and revise a note
regarding instrumentation requirements for all three BFN reactors.

A copy of the NRC's Safety Evaluation is enclosed. A Notice of Issuance will
be included in the Commission's next 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. 223 to License No. DPR-33
- 2. Amendment No. 238 to License No. DPR-52
- 3. Amendment No. 197 to License No. DPR-68
- 4. Safety Evaluation

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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. 223
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 May 11, 1995, and supplemented on June 30, 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.

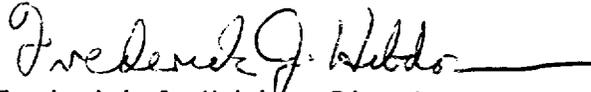
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-33 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 223, 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. Hebden, Director
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 29, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 223

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. A **Spillover page is provided to maintain document completeness.

REMOVE

3.1/4.1-5
3.1/4.1-6

INSERT

3.1/4.1-5
3.1/4.1-6**

NOTES FOR TABLE 3.1.A

1. There shall be two OPERABLE or tripped trip systems for each function. If the minimum number of OPERABLE instrument channels per trip system cannot be met for one trip system, trip the inoperable channels or entire trip system within one hour, or, alternatively, take the below listed action for that trip function. If the minimum number of OPERABLE instrument channels cannot be met by either trip system, the appropriate action listed below (refer to right-hand column of Table) shall be taken. An inoperable channel need not be placed in the tripped condition where this would cause the trip function to occur. In these cases, the inoperable channel shall be restored to OPERABLE status within two hours, or take the action listed below for that trip function.
 - A. Initiate insertion of OPERABLE rods and complete insertion of all OPERABLE rods within four hours. In refueling mode, suspend all operations involving core alterations and fully insert all OPERABLE control rods within one hour.
 - B. Reduce power level to IRM range and place mode switch in the STARTUP/HOT Standby position within 8 hours.
 - C. Reduce turbine load and close main steam line isolation valves within 8 hours.
 - D. Reduce power to less than 30 percent of rated.
2. The scram discharge volume high water level bypass may be used in SHUTDOWN or REFUEL to bypass the scram discharge volume high-high water level scram signal in order to reset the reactor protection system trip. A control rod withdraw block is present when this scram signal is bypassed.
3. Bypassed if reactor pressure is less than 1055 psig and mode switch not in RUN.
4. Bypassed when turbine first stage pressure is less than 154 psig.
5. IRMs are bypassed when APRMs are onscale and the reactor mode switch is in the RUN position.
6. The design permits closure of any two lines without a scram being initiated.
7. When the reactor is subcritical and the reactor water temperature is less than 212°F, only the following trip functions need to be OPERABLE:
 - A. Mode switch in shutdown
 - B. Manual scram
 - C. High flux IRM

NOTES FOR TABLE 3.1.A (Cont'd)

- D. Scram discharge volume high level
- E. APRM 15 percent scram
- 8. Not required to be OPERABLE when primary containment integrity is not required.
- 9. (Deleted)
- 10. Not required to be OPERABLE when the reactor pressure vessel head is not bolted to the vessel.
- 11. The APRM downscale trip function is only active when the reactor mode switch is in RUN.
- 12. The APRM downscale trip is automatically bypassed when the IRM instrumentation is OPERABLE and not high.
- 13. Less than 14 OPERABLE LPRMs will cause a trip system trip.
- 14. Channel shared by Reactor Protection System and Primary Containment and Reactor Vessel Isolation Control System. A channel failure may be a channel failure in each system.
- 15. The APRM 15 percent scram is bypassed in the RUN Mode.
- 16. Channel shared by Reactor Protection System and Reactor Manual Control System (Rod Block Portion). A channel failure may be a channel failure in each system. If a channel is allowed to be inoperable per Table 3.1.A, the corresponding function in that same channel may be inoperable in the Reactor Manual Control System (Rod Block).
- 17. Not required while performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t).
- 18. This function must inhibit the automatic bypassing of turbine control valve fast closure or turbine trip scram and turbine stop valve closure scram whenever turbine first state pressure is greater than or equal to 154 psig.
- 19. Action 1.A or 1.D shall be taken only if the permissive fails in such a manner to prevent the affected RPS logic from performing its intended function. Otherwise, no action is required.
- 20. (Deleted)
- 21. The APRM High Flux and Inoperative Trips do not have to be OPERABLE in the REFUEL Mode if the Source Range Monitors are connected to give a noncoincidence, High Flux scram, at 5×10^5 cps. The SRMs shall be OPERABLE per Specification 3.10.B.1. The removal of eight (8) shorting links is required to provide noncoincidence high-flux scram protection from the Source Range Monitors.



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. 238
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 May 11, 1995, and supplemented on June 30, 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.

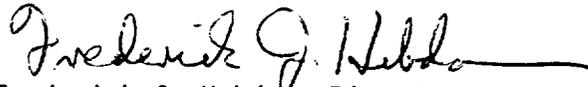
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-52 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 238, 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-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 29, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 238

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 and **spillover pages are provided to maintain document completeness.

REMOVE

3.1/4.1-5
3.1/4.1-6
3.1/4.1-16
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3.1/4.1-18
3.1/4.1-19
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3.1/4.1-21

INSERT

3.1/4.1-5
3.1/4.1-6**
3.1/4.1-16*
3.1/4.1-17
3.1/4.1-18
3.1/4.1-19**
3.1/4.1-20**
3.1/4.1-21*

NOTES FOR TABLE 3.1.A

1. There shall be two OPERABLE or tripped trip systems for each function. If the minimum number of OPERABLE instrument channels per trip system cannot be met for one trip system, trip the inoperable channels or entire trip system within one hour, or, alternatively, take the below listed action for that trip function. If the minimum number of OPERABLE instrument channels cannot be met by either trip system, the appropriate action listed below (refer to right-hand column of Table) shall be taken. An inoperable channel need not be placed in the tripped condition where this would cause the trip function to occur. In these cases, the inoperable channel shall be restored to OPERABLE status within two hours, or take the action listed below for that trip function.
 - A. Initiate insertion of OPERABLE rods and complete insertion of all OPERABLE rods within four hours. In refueling mode, suspend all operations involving core alterations and fully insert all OPERABLE control rods within one hour.
 - B. Reduce power level to IRM range and place mode switch in the STARTUP/HOT Standby position within 8 hours.
 - C. Reduce turbine load and close main steam line isolation valves within 8 hours.
 - D. Reduce power to less than 30 percent of rated.
2. The scram discharge volume high water level bypass may be used in SHUTDOWN or REFUEL to bypass both the scram discharge volume high-high water level and scram pilot air header low pressure scram signals in order to reset the reactor protection system trip. A control rod withdraw block is present when these scram signals are bypassed.
3. (Deleted)
4. Bypassed when turbine first stage pressure is less than 154 psig.
5. IRMs are bypassed when APRMs are onscale and the reactor mode switch is in the RUN position.
6. The design permits closure of any two lines without a scram being initiated.
7. When the reactor is subcritical and the reactor water temperature is less than 212°F, only the following trip functions need to be OPERABLE:
 - A. Mode switch in SHUTDOWN
 - B. Manual scram
 - C. High flux IRM
 - D. Scram discharge volume high level

NOTES FOR TABLE 3.1.A (Cont'd)

- E. APRM 15 percent scram
- F. Scram pilot air header low pressure
- 8. Not required to be OPERABLE when primary containment integrity is not required.
- 9. (Deleted)
- 10. Not required to be OPERABLE when the reactor pressure vessel head is not bolted to the vessel.
- 11. The APRM downscale trip function is only active when the reactor mode switch is in RUN.
- 12. The APRM downscale trip is automatically bypassed when the IRM instrumentation is OPERABLE and not high.
- 13. Less than 14 OPERABLE LPRMs will cause a trip system trip.
- 14. Channel shared by Reactor Protection System and Primary Containment and Reactor Vessel Isolation Control System. A channel failure may be a channel failure in each system.
- 15. The APRM 15 percent scram is bypassed in the RUN Mode.
- 16. Channel shared by Reactor Protection System and Reactor Manual Control System (Rod Block Portion). A channel failure may be a channel failure in each system. If a channel is allowed to be inoperable per Table 3.1.A, the corresponding function in that same channel may be inoperable in the Reactor Manual Control System (Rod Block).
- 17. Not required while performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t).
- 18. This function must inhibit the automatic bypassing of turbine control valve fast closure or turbine trip scram and turbine stop valve closure scram whenever turbine first stage pressure is greater than or equal to 154 psig.
- 19. Action 1.A or 1.D shall be taken only if the permissive fails in such a manner to prevent the affected RPS logic from performing its intended function. Otherwise, no action is required.
- 20. (Deleted)
- 21. The APRM High Flux and Inoperative Trips do not have to be OPERABLE in the REFUEL Mode if the Source Range Monitors are connected to give a noncoincidence, High Flux scram, at 5×10^5 cps. The SRMs shall be OPERABLE per Specification 3.10.B.1. The removal of eight (8) shorting links is required to provide noncoincidence high-flux scram protection from the Source Range Monitors.

3.1 BASES (Cont'd)

be accommodated which would result in slow scram times or partial control rod insertion. To preclude this occurrence, level switches have been provided in the instrument volume which alarm and scram the reactor when the volume of water reaches 50 gallons. As indicated above, there is sufficient volume in the piping to accommodate the scram without impairment of the scram times or amount of insertion of the control rods. This function shuts the reactor down while sufficient volume remains to accommodate the discharge water and precludes the situation in which a scram would be required but not be able to perform its function adequately.

A source range monitor (SRM) system is also provided to supply additional neutron level information during startup but has no scram functions. Reference Section 7.5.4 FSAR. Thus, the IRM is required in the REFUEL and STARTUP modes. In the power range the APRM system provides required protection. Reference Section 7.5.7 FSAR. Thus, the IRM System is not required in the RUN mode. The APRMs and the IRMs provide adequate coverage in the STARTUP and intermediate range.

The high reactor pressure, high drywell pressure, reactor low water level, low scram pilot air header pressure and scram discharge volume high level scrams are required for STARTUP and RUN modes of plant operation. They are, therefore, required to be operational for these modes of reactor operation.

The requirement to have the scram functions as indicated in Table 3.1.A OPERABLE in the REFUEL mode is to assure that shifting to the REFUEL mode during reactor power operation does not diminish the need for the reactor protection system.

Because of the APRM downscale limit of ≥ 3 percent when in the RUN mode and high level limit of ≤ 15 percent when in the STARTUP Mode, the transition between the STARTUP and RUN Modes must be made with the APRM instrumentation indicating between 3 percent and 15 percent of rated power or a control rod scram will occur. In addition, the IRM system must be indicating below the High Flux setting (120/125 of scale) or a scram will occur when in the STARTUP Mode. For normal operating conditions, these limits provide assurance of overlap between the IRM system and APRM system so that there are no "gaps" in the power level indications (i.e., the power level is continuously monitored from beginning of startup to full power and from full power to SHUTDOWN). When power is being reduced, if a transfer to the STARTUP mode is made and the IRMs have not been fully inserted (a maloperational but not impossible condition) a control rod block immediately occurs so that reactivity insertion by control rod withdrawal cannot occur.

The low scram pilot air header pressure trip performs the same function as the high water level in the scram discharge instrument volume for fast fill events in which the high level instrument response time may be inadequate. A fast fill event is postulated for certain degraded control air events in which the scram outlet valves unseat enough to allow 5 gpm per drive leakage into the scram discharge volume but not enough to cause control rod insertion.

4.1 BASES

The minimum functional testing frequency used in this specification is based on a reliability analysis using the concepts developed in reference (1). This concept was specifically adapted to the one-out-of-two taken twice logic of the reactor protection system. The analysis shows that the sensors are primarily responsible for the reliability of the reactor protection system. This analysis makes use of "unsafe failure" rate experience at conventional and nuclear power plants in a reliability model for the system. An "unsafe failure" is defined as one which negates channel operability and which, due to its nature, is revealed only when the channel is functionally tested or attempts to respond to a real signal. Failure such as blown fuses, ruptured bourdon tubes, faulted amplifiers, faulted cables, etc., which result in "upscale" or "downscale" readings on the reactor instrumentation are "safe" and will be easily recognized by the operators during operation because they are revealed by an alarm or a scram.

The channels listed in Tables 4.1.A and 4.1.B are divided into three groups for functional testing. These are:

- A. On-Off sensors that provide a scram trip function.
- B. Analog devices coupled with bistable trips that provide a scram function.
- C. Devices which only serve a useful function during some restricted mode of operation, such as STARTUP or SHUTDOWN, or for which the only practical test is one that can be performed at SHUTDOWN.

The sensors that make up group (A) are specifically selected from among the whole family of industrial on-off sensors that have earned an excellent reputation for reliable operation. During design, a goal of 0.9999 probability of success (at the 50 percent confidence level) was adopted to assure that a balanced and adequate design is achieved. The probability of success is primarily a function of the sensor failure rate and the test interval. A three-month test interval was planned for group (A) sensors. This is in keeping with good operating practices, and satisfies the design goal for the logic configuration utilized in the Reactor Protection System.

The once per six-month functional test frequency for the scram pilot air header low pressure trip function is acceptable due to:

1. The functional reliability previously demonstrated by these switches on Unit 2 during Cycles 6 and 7,
2. The need for minimizing the radiation exposure associated with the functional testing of these switches, and
3. The increased risk to plant availability while the plant is in a half-scram condition during the performance of the functional testing versus the limited increase in reliability that would be obtained by more frequent functional testing.

4.1 BASES (Cont'd)

A single failure of one of the scram pilot air header low pressure trip switches would not result in the loss of the trip function. It is highly unlikely that two switches in one channel would experience an undetected failure during the period between six-month functional tests.

To satisfy the long-term objective of maintaining an adequate level of safety throughout the plant lifetime, a minimum goal of 0.9999 at the 95 percent confidence level is proposed. With the (1-out-of-2) X (2) logic, this requires that each sensor have an availability of 0.993 at the 95 percent confidence level. This level of availability may be maintained by adjusting the test interval as a function of the observed failure history.¹

To facilitate the implementation of this technique, Figure 4.1-1 is provided to indicate an appropriate trend in test interval. The procedure is as follows:

1. Like sensors are pooled into one group for the purpose of data acquisition.
2. The factor M is the exposure hours and is equal to the number of sensors in a group, n, times the elapsed time T ($M = nT$).
3. The accumulated number of unsafe failures is plotted as an ordinate against M as an abscissa on Figure 4.1-1.
4. After a trend is established, the appropriate monthly test interval to satisfy the goal will be the test interval to the left of the plotted points.
5. A test interval of one month will generally be used initially until a trend is established.

Group (B) devices utilize an analog sensor followed by an amplifier and a bistable trip circuit. The sensor and amplifier are active components and a failure is almost always accompanied by an alarm and an indication of the source of trouble. In the event of failure, repair or substitution can start immediately. An "as-is" failure is one that "sticks" mid-scale and is not capable of going either up or down in response to an out-of-limits input. This type of failure for analog devices is a rare occurrence and is detectable by an operator who observes that one signal does not track the other three. For purpose of analysis, it is assumed that this rare failure will be detected within two hours.

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1. Reliability of Engineered Safety Features as a Function of Testing Frequency, I. M. Jacobs, "Nuclear Safety," Vol. 9, No. 4, July-August, 1968, pp. 310-312.

4.1 BASES (Cont'd)

The bistable trip circuit which is a part of the Group (B) devices can sustain unsafe failures which are revealed only on test. Therefore, it is necessary to test them periodically.

A study was conducted of the instrumentation channels included in the Group (B) devices to calculate their "unsafe" failure rates. The analog devices (sensors and amplifiers) are predicted to have an unsafe failure rate of less than 20×10^{-6} failure/hour. The bistable trip circuits are predicted to have unsafe failure rate of less than 2×10^{-6} failures/hour. Considering the two hour monitoring interval for the analog devices as assumed above, and a weekly test interval for the bistable trip circuits, the design reliability goal of 0.99999 is attained with ample margin.

The bistable devices are monitored during plant operation to record their failure history and establish a test interval using the curve of Figure 4.1-1. There are numerous identical bistable devices used throughout the plant's instrumentation system. Therefore, significant data on the failure rates for the bistable devices should be accumulated rapidly.

The frequency of calibration of the APRM Flow Biasing Network has been established at each refueling outage. There are several instruments which must be calibrated and it will take several hours to perform the calibration of the entire network. While the calibration is being performed, a zero flow signal will be sent to half of the APRMs resulting in a half scram and rod block condition. Thus, if the calibration were performed during operation, flux shaping would not be possible. Based on experience at other generating stations, drift of instruments, such as those in the Flow Biasing Network, is not significant and therefore, to avoid spurious scrams, a calibration frequency of each refueling outage is established.

Group (C) devices are active only during a given portion of the operational cycle. For example, the IRM is active during STARTUP and inactive during full-power operation. Thus, the only test that is meaningful is the one performed just prior to SHUTDOWN or STARTUP: i.e., the tests that are performed just prior to use of the instrument.

Calibration frequency of the instrument channel is divided into two groups. These are as follows:

1. Passive type indicating devices that can be compared with like units on a continuous basis.
2. Vacuum tube or semiconductor devices and detectors that drift or lose sensitivity.

Experience with passive type instruments in generating stations and substations indicates that the specified calibrations are adequate. For those devices which employ amplifiers, etc., drift specifications call for drift to be less than 0.4 percent/month; i.e., in the period of a month a drift of 4 percent would occur and thus providing for adequate margin.

4.1 BASES (Cont'd)

For the APRM system drift of electronic apparatus is not the only consideration in determining a calibration frequency. Change in power distribution and loss of chamber sensitivity dictate a calibration every seven days. Calibration on this frequency assures plant operation at or below thermal limits.

A comparison of Tables 4.1.A and 4.1.B indicates that two instrument channels have been included in the latter table. These are: mode switch in SHUTDOWN and manual scram. All of the devices or sensors associated with these scram functions are simple on-off switches and, hence, calibration during operation is not applicable, i.e., the switch is either on or off.

The sensitivity of LPRM detectors decreases with exposure to neutron flux at a slow and approximately constant rate. The APRM system, which uses the LPRM readings to detect a change in thermal power, will be calibrated every seven days using a heat balance to compensate for this change in sensitivity. The RBM system uses the LPRM reading to detect a localized change in thermal power. It applies a correction factor based on the APRM output signal to determine the percent thermal power and therefore any change in LPRM sensitivity is compensated for by the APRM calibration. The technical specification limits of CMFLPD, CPR, and APLHGR are determined by the use of the process computer or other backup methods. These methods use LPRM readings and TIP data to determine the power distribution.

Compensation in the process computer for changes in LPRM sensitivity will be made by performing a full core TIP traverse to update the computer calculated LPRM correction factors every 1000 effective full power hours.

As a minimum the individual LPRM meter readings will be adjusted at the beginning of each operating cycle before reaching 100 percent power.

MAY 20 1993

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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. 197
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 May 11, 1995, and supplemented on June 30, 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.

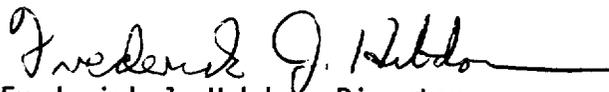
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-68 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 197, 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-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 29, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 197

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 and **spillover pages are provided to maintain document completeness.

REMOVE

3.1/4.1-2
3.1/4.1-3
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3.1/4.1-7
3.1/4.1-8
3.1/4.1-10
3.1/4.1-11
3.1/4.1-15
3.1/4.1-16
3.1/4.1-17
3.1/4.1-18
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3.1/4.1-2*
3.1/4.1-3
3.1/4.1-4
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TABLE 3.1.A
 REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENTS

Min. No. of Operable Instr. Channels Per Trip System (1)(23)	Trip Function	Trip Level Setting	Shut-down	Modes in Which Function Must Be Operable		Run	Action (1)
				Refuel (7)	Startup/Hot Standby		
1	Mode Switch in Shutdown		X	X	X	X	1.A
1	Manual Scram		X	X	X	X	1.A
3	IRM (16) High Flux	$\leq 120/125$ Indicated on scale	X(22)	X(22)	X	(5)	1.A
3	Inoperative			X	X	(5)	1.A
2	APRM (16)(24)(25) High Flux (Fixed Trip)	$\leq 120\%$				X	1.A or 1.B
2	High Flux (Flow Biased)	See Spec. 2.1.A.1				X	1.A or 1.B
2	High Flux	$\leq 15\%$ rated power		X(21)	X(17)	(15)	1.A
2	Inoperative	(13)		X(21)	X(17)	X	1.A
2	Downscale	≥ 3 Indicated on Scale		(11)	(11)	X(12)	1.A or 1.B
2	High Reactor Pressure (PIS-3-22AA, BB, C, D)	≤ 1055 psig		X(10)	X	X	1.A
2	High Drywell Pressure (14) (PIS-64-56 A-D)	≤ 2.5 psig		X(8)	X(8)	X	1.A
2	Reactor Low Water Level (14) (LIS-3-203 A-D)	≥ 538 " above vessel zero		X	X	X	1.A

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TABLE 3.1.A
 REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENTS

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Min. No. of Operable Instr. Channels Per Trip System (1)(23)	Trip Function	Trip Level Setting	Shut-down	Modes in Which Function Must Be Operable			Action (1)
				Refuel (7)	Hot Standby	Run	
2	High Water Level in West Scram Discharge Tank (LS-85-45A-D)	≤ 50 Gallons	X(2)	X(2)	X	X	1.A
2	High Water Level in East Scram Discharge Tank (LS-85-45E-H)	≤ 50 Gallons	X(2)	X(2)	X	X	1.A
4	Main Steam Line Isolation Valve Closure	≤10% Valve Closure				X(6)	1.A or 1.C
2	Turbine Control Valve Fast Closure or Turbine Trip	≥550 psig				X(4)	1.A or 1.D
4	Turbine Stop Valve Closure	≤10% Valve Closure				X(4)	1.A or 1.D
2	Turbine First Stage Pressure Permissive (PIS-1-81A&B) (PIS-1-91A&B)	not ≥154 psig		X(18)	X(18)	X(18)	1.A or 1.D (19)
2	Low Scram Pilot Air Header Pressure	≥ 50 psig	X(2)	X(2)	X	X	1.A

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NOTES FOR TABLE 3.1.A

1. There shall be two OPERABLE or tripped trip systems for each function. If the minimum number of OPERABLE instrument channels per trip system cannot be met for one trip system, trip the inoperable channels or entire trip system within one hour, or, alternatively, take the below listed action for that trip function. If the minimum number of OPERABLE instrument channels cannot be met by either trip system, the appropriate action listed below (refer to right-hand column of Table) shall be taken. An inoperable channel need not be placed in the tripped condition where this would cause the trip function to occur. In these cases, the inoperable channel shall be restored to OPERABLE status within two hours, or take the action listed below for that trip function.
 - A. Initiate insertion of OPERABLE rods and complete insertion of all OPERABLE rods within four hours. In refueling mode, suspend all operations involving core alterations and fully insert all OPERABLE control rods within one hour.
 - B. Reduce power level to IRM range and place mode switch in the STARTUP/HOT STANDBY position within 8 hours.
 - C. Reduce turbine load and close main steam line isolation valves within 8 hours.
 - D. Reduce power to less than 30 percent of rated.
2. The scram discharge volume high water level bypass may be used in SHUTDOWN or REFUEL to bypass both the scram discharge volume high-high water level and scram pilot air header low pressure scram signals in order to reset the reactor protection system trip. A control rod withdraw block is present when these scram signals are bypassed.
3. DELETED
4. Bypassed when turbine first stage pressure is less than 154 psig.
5. IRMs are bypassed when APRMs are onscale and the reactor mode switch is in the RUN position.
6. The design permits closure of any two lines without a scram being initiated.
7. When the reactor is subcritical and the reactor water temperature is less than 212°F, only the following trip functions need to be OPERABLE:
 - A. Mode switch in shutdown
 - B. Manual scram
 - C. High flux IRM
 - D. Scram discharge volume high level

NOTES FOR TABLE 3.1.A (Cont'd)

- E. APRM 15 percent scram
- F. Scram pilot air header low pressure
- 8. Not required to be OPERABLE when primary containment integrity is not required.
- 9. (Deleted)
- 10. Not required to be OPERABLE when the reactor pressure vessel head is not bolted to the vessel.
- 11. The APRM downscale trip function is only active when the reactor mode switch is in RUN.
- 12. The APRM downscale trip is automatically bypassed when the IRM instrumentation is OPERABLE and not high.
- 13. Less than 14 OPERABLE LPRMs will cause a trip system trip.
- 14. Channel shared by Reactor Protection System and Primary Containment and Reactor Vessel Isolation Control System. A channel failure may be a channel failure in each system.
- 15. The APRM 15 percent scram is bypassed in the RUN Mode.
- 16. Channel shared by Reactor Protection System and Reactor Manual Control System (Rod Block Portion). A channel failure may be a channel failure in each system. If a channel is allowed to be inoperable per Table 3.1.A, the corresponding function in that same channel may be inoperable in the Reactor Manual Control System (Rod Block).
- 17. Not required while performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5 MWt.
- 18. This function must inhibit the automatic bypassing of turbine control valve fast closure or turbine trip scram and turbine stop valve closure scram whenever turbine first stage pressure is greater than or equal to 154 psig.
- 19. Action 1.A or 1.D shall be taken only if the permissive fails in such a manner to prevent the affected RPS logic from performing its intended function. Otherwise, no action is required.
- 20. (Deleted)
- 21. The APRM High Flux and Inoperative Trips do not have to be OPERABLE in the REFUEL Mode if the Source Range Monitors are connected to give a noncoincidence, High Flux scram, at 5×10^5 cps. The SRMs shall be OPERABLE per Specification 3.10.B.1. The removal of eight (8) shorting links is required to provide noncoincidence high-flux scram protection from the Source Range Monitors.

TABLE 4.1.A
 REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION FUNCTIONAL TESTS
 MINIMUM FUNCTIONAL TEST FREQUENCIES FOR SAFETY INSTR. AND CONTROL CIRCUITS

	<u>Group (2)</u>	<u>Functional Test</u>	<u>Minimum Frequency(3)</u>
Mode Switch in Shutdown	A	Place Mode Switch in Shutdown	Each Refueling Outage
Manual Scram	A	Trip Channel and Alarm	Every 3 Months
IRM			
High Flux	C	Trip Channel and Alarm (4)	Once Per Week During Refueling and Before Each Startup
Inoperative	C	Trip Channel and Alarm (4)	Once Per Week During Refueling and Before Each Startup
APRM			
High Flux (15% Scram)	C	Trip Output Relays (4)	Before Each Startup and Weekly When Required to be Operable
High Flux (Flow Biased)	B	Trip Output Relays (4)	Once/Week
High Flux (Fixed Trip)	B	Trip Output Relays (4)	Once/Week
Inoperative	B	Trip Output Relays (4)	Once/Week
Downscale	B	Trip Output Relays (4)	Once/Week
Flow Bias	B	(6)	(6)
High Reactor Pressure (PIS-3-22AA, BB, C, D)	B	Trip Channel and Alarm (7)	Once/Month
High Drywell Pressure (PIS-64-56 A-D)	B	Trip Channel and Alarm (7)	Once/Month
Reactor Low Water Level (LIS-3-203 A-D)	B	Trip Channel and Alarm (7)	Once/Month

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TABLE 4.1.A (Continued)

	<u>Group (2)</u>	<u>Functional Test</u>	<u>Minimum Frequency(3)</u>
High Water Level in Scram Discharge Tank Float Switches (LS-85-45C-F)	A	Trip Channel and Alarm	Once/Month
Electronic Level Switches (LS-85-45A, B, G, H)	B	Trip Channel and Alarm (7)	Once/Month
Main Steam Line Isolation Valve Closure	A	Trip Channel and Alarm	Once/3 Months (8)
Turbine Control Valve Fast Closure or turbine trip	A	Trip Channel and Alarm	Once/Month (1)
Turbine First Stage Pressure Permissive (PIS-1-81A and B, PIS-1-91A and B)	B	Trip Channel and Alarm (7)	Every three months
Turbine Stop Valve Closure	A	Trip Channel and Alarm	Once/Month (1)
Low Scram Pilot Air Header Pressure (PS 85-35 A1, A2, B1, and B2)	A	Trip Channel and Alarm	Once/6 Months

TABLE 4.1.B
REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENT CALIBRATION
MINIMUM CALIBRATION FREQUENCIES FOR REACTOR PROTECTION INSTRUMENT CHANNELS

<u>Instrument Channel</u>	<u>Group (1)</u>	<u>Calibration</u>	<u>Minimum Frequency(2)</u>
IRM High Flux	C	Comparison to APRM on Controlled Startups (6)	Note (4)
APRM High Flux Output Signal	B	Heat Balance	Once Every 7 Days
Flow Bias Signal	B	Calibrate Flow Bias Signal (7)	Once/Operating Cycle
LPRM Signal	B	TIP System Traverse (8)	Every 1000 Effective Full Power Hours
High Reactor Pressure (PIS-3-22AA, BB, C, D)	B	Standard Pressure Source	Once/6 Months(9)
High Drywell Pressure (PIS-64-56 A-D)	B	Standard Pressure Source	Once/18 Months(9)
Reactor Low Water Level (LIS-3-203 A-D)	B	Pressure Standard	Once/18 Months(9)
High Water Level in Scram Discharge Volume Float Switches (LS-85-45C-F)	A	Calibrated Water Column (5)	Note (5)
Electronic Lvl Switches (LS-85-45-A, B, G, H)	B	Calibrated Water Column	Once/Operating Cycle (9)
Main Steam Line Isolation Valve Closure	A	Note (5)	Note (5)
Turbine First Stage Pressure Permissive (PIS-1-81A&B, PIS-1-91A&B)	B	Standard Pressure Source	Once/18 Months(9)
Turbine Control Valve Fast Closure or Turbine Trip	A	Standard Pressure Source	Once/Operating Cycle
Turbine Stop Valve Closure	A	Note (5)	Note (5)
Low Scram Pilot Air Header Pressure (PS 85-35 A1, A2, B1 and B2)	A	Standard Pressure Source	Once/18 Months

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NOTES FOR TABLE 4.1.B

1. A description of three groups is included in the Bases of this specification.
2. Calibrations are not required when the systems are not required to be OPERABLE or are tripped. If calibrations are missed, they shall be performed prior to returning the system to an OPERABLE status.
3. (Deleted)
4. Required frequency is initial startup following each refueling outage.
5. Physical inspection and actuation of these position switches will be performed once per operating cycle.
6. On controlled startups, overlap between the IRMs and APRMs will be verified.
7. The Flow Bias Signal Calibration will consist of calibrating the sensors, flow converters, and signal offset networks during each operating cycle. The instrumentation is an analog type with redundant flow signals that can be compared. The flow comparator trip and upscale will be functionally tested according to Table 4.2.C to ensure the proper operation during the operating cycle. Refer to 4.1 Bases for further explanation of calibration frequency.
8. A complete TIP system traverse calibrates the LPRM signals to the process computer. The individual LPRM meter readings will be adjusted as a minimum at the beginning of each operating cycle before reaching 100 percent power.
9. Calibration consists of the adjustment of the primary sensor and associated components so that they correspond within acceptable range and accuracy to known values of the parameter which the channel monitors, including adjustment of the electronic trip circuitry, so that its output relay changes state at or more conservatively than the analog equivalent of the trip level setting.

3.1 BASES (Cont'd)

be accommodated which would result in slow scram times or partial control rod insertion. To preclude this occurrence, level switches have been provided in the instrument volume which alarm and scram the reactor when the volume of water reaches 50 gallons. As indicated above, there is sufficient volume in the piping to accommodate the scram without impairment of the scram times or amount of insertion of the control rods. This function shuts the reactor down while sufficient volume remains to accommodate the discharge water and precludes the situation in which a scram would be required but not be able to perform its function adequately.

A source range monitor (SRM) system is also provided to supply additional neutron level information during startup but has no scram functions. Reference Section 7.5.4 FSAR. Thus, the IRM is required in the REFUEL and STARTUP modes. In the power range the APRM system provides required protection. Reference Section 7.5.7 FSAR. Thus, the IRM System is not required in the RUN mode. The APRMs and the IRMs provide adequate coverage in the STARTUP and intermediate range.

The high reactor pressure, high drywell pressure, reactor low water level, low scram pilot air header pressure and scram discharge volume high level scrams are required for STARTUP and RUN modes of plant operation. They are, therefore, required to be operational for these modes of reactor operation.

The requirement to have the scram functions as indicated in Table 3.1.1 OPERABLE in the REFUEL mode is to assure that shifting to the REFUEL mode during reactor power operation does not diminish the need for the reactor protection system.

Because of the APRM downscale limit of ≥ 3 percent when in the RUN mode and high level limit of ≤ 15 percent when in the STARTUP Mode, the transition between the STARTUP and RUN Modes must be made with the APRM instrumentation indicating between 3 percent and 15 percent of rated power or a control rod scram will occur. In addition, the IRM system must be indicating below the High Flux setting (120/125 of scale) or a scram will occur when in the STARTUP Mode. For normal operating conditions, these limits provide assurance of overlap between the IRM system and APRM system so that there are no "gaps" in the power level indications (i.e., the power level is continuously monitored from beginning of startup to full power and from full power to shutdown). When power is being reduced, if a transfer to the STARTUP mode is made and the IRMs have not been fully inserted (a maloperational but not impossible condition) a control rod block immediately occurs so that reactivity insertion by control rod withdrawal cannot occur.

The low scram pilot air header pressure trip performs the same function as the high water level in the scram discharge instrument volume for fast fill events in which the high level instrument response time may be inadequate. A fast fill event is postulated for certain degraded control air events in which the scram outlet valves unseat enough to allow 5 gpm per drive leakage into the scram discharge volume but not enough to cause control rod insertion.

4.1 BASES

The minimum functional testing frequency used in this specification is based on a reliability analysis using the concepts developed in reference (1). This concept was specifically adapted to the one-out-of-two taken twice logic of the reactor protection system. The analysis shows that the sensors are primarily responsible for the reliability of the reactor protection system. This analysis makes use of "unsafe failure" rate experience at conventional and nuclear power plants in a reliability model for the system. An "unsafe failure" is defined as one which negates channel operability and which, due to its nature, is revealed only when the channel is functionally tested or attempts to respond to a real signal. Failure such as blown fuses, ruptured bourdon tubes, faulted amplifiers, faulted cables, etc., which result in "upscale" or "downscale" readings on the reactor instrumentation are "safe" and will be easily recognized by the operators during operation because they are revealed by an alarm or a scram.

The channels listed in Tables 4.1.A and 4.1.B are divided into three groups for functional testing. These are:

- A. On-Off sensors that provide a scram trip function.
- B. Analog devices coupled with bistable trips that provide a scram function.
- C. Devices which only serve a useful function during some restricted mode of operation, such as STARTUP or SHUTDOWN, or for which the only practical test is one that can be performed at shutdown.

The sensors that make up group (A) are specifically selected from among the whole family of industrial on-off sensors that have earned an excellent reputation for reliable operation. During design, a goal of 0.99999 probability of success (at the 50 percent confidence level) was adopted to assure that a balanced and adequate design is achieved. The probability of success is primarily a function of the sensor failure rate and the test interval. A three-month test interval was planned for group (A) sensors. This is in keeping with good operating practices, and satisfies the design goal for the logic configuration utilized in the Reactor Protection System.

The once per six-month functional test frequency for the scram pilot air header low pressure trip function is acceptable due to:

1. The functional reliability previously demonstrated by these switches on Unit 2 during Cycles 6 and 7,
2. The need for minimizing the radiation exposure associated with the functional testing of these switches, and
3. The increased risk to plant availability while the plant is in a half-scram condition during the performance of the functional testing versus the limited increase in reliability that would be obtained by more frequent functional testing.

4.1 BASES (Cont'd)

A single failure of one of the scram pilot air header low pressure trip switches would not result in the loss of the trip function. It is highly unlikely that two switches in one channel would experience an undetected failure during the period between six-month functional tests.

To satisfy the long-term objective of maintaining an adequate level of safety throughout the plant lifetime, a minimum goal of 0.9999 at the 95-percent confidence level is proposed. With the (1-out-of-2) X (2) logic, this requires that each sensor have an availability of 0.993 at the 95 percent confidence level. This level of availability may be maintained by adjusting the test interval as a function of the observed failure history.¹

To facilitate the implementation of this technique, Figure 4.1-1 is provided to indicate an appropriate trend in test interval. The procedure is as follows:

1. Like sensors are pooled into one group for the purpose of data acquisition.
2. The factor M is the exposure hours and is equal to the number of sensors in a group, n, times the elapsed time T ($M = nT$).
3. The accumulated number of unsafe failures is plotted as an ordinate against M as an abscissa on Figure 4.1-1.
4. After a trend is established, the appropriate monthly test interval to satisfy the goal will be the test interval to the left of the plotted points.
5. A test interval of one month will generally be used initially until a trend is established.

Group (B) devices utilize an analog sensor followed by an amplifier and a bistable trip circuit. The sensor and amplifier are active components and a failure is almost always accompanied by an alarm and an indication of the source of trouble. In the event of failure, repair or substitution can start immediately. An "as-is" failure is one that "sticks" mid-scale and is not capable of going either up or down in response to an out-of-limits input. This type of failure for analog devices is a rare occurrence and is detectable by an operator who observes that one signal does not track the other three. For purpose of analysis, it is assumed that this rare failure will be detected within two hours.

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1. Reliability of Engineered Safety Features as a Function of Testing Frequency, I. M. Jacobs, "Nuclear Safety," Vol. 9, No. 4, July-August, 1968, pp. 310-312.

4.1 BASES (Cont'd)

The bistable trip circuit which is a part of the Group (B) devices can sustain unsafe failures which are revealed only on test. Therefore, it is necessary to test them periodically.

A study was conducted of the instrumentation channels included in the Group (B) devices to calculate their "unsafe" failure rates. The analog devices (sensors and amplifiers) are predicted to have an unsafe failure rate of less than 20×10^{-6} failure/hour. The bistable trip circuits are predicted to have unsafe failure rate of less than 2×10^{-6} failures/hour. Considering the two hour monitoring interval for the analog devices as assumed above, and a weekly test interval for the bistable trip circuits, the design reliability goal of 0.99999 is attained with ample margin.

The bistable devices are monitored during plant operation to record their failure history and establish a test interval using the curve of Figure 4.1-1. There are numerous identical bistable devices used throughout the plant's instrumentation system. Therefore, significant data on the failure rates for the bistable devices should be accumulated rapidly.

The frequency of calibration of the APRM Flow Biasing Network has been established at each refueling outage. There are several instruments which must be calibrated and it will take several hours to perform the calibration of the entire network. While the calibration is being performed, a zero flow signal will be sent to half of the APRMs resulting in a half scram and rod block condition. Thus, if the calibration were performed during operation, flux shaping would not be possible. Based on experience at other generating stations, drift of instruments, such as those in the Flow Biasing Network, is not significant and therefore, to avoid spurious scrams, a calibration frequency of each refueling outage is established.

Group (C) devices are active only during a given portion of the operational cycle. For example, the IRM is active during STARTUP and inactive during full-power operation. Thus, the only test that is meaningful is the one performed just prior to SHUTDOWN or STARTUP; i.e., the tests that are performed just prior to use of the instrument.

Calibration frequency of the instrument channel is divided into two groups. These are as follows:

1. Passive type indicating devices that can be compared with like units on a continuous basis.
2. Vacuum tube or semiconductor devices and detectors that drift or lose sensitivity.

4.1 BASES (Cont'd)

Experience with passive type instruments in generating stations and substations indicates that the specified calibrations are adequate. For those devices which employ amplifiers, etc., drift specifications call for drift to be less than 0.4 percent/month; i.e., in the period of a month a drift of .4-percent would occur and thus providing for adequate margin.

For the APRM system drift of electronic apparatus is not the only consideration in determining a calibration frequency. Change in power distribution and loss of chamber sensitivity dictate a calibration every seven days. Calibration on this frequency assures plant operation at or below thermal limits.

A comparison of Tables 4.1.A and 4.1.B indicates that two instrument channels have been included in the latter table. These are: mode switch in SHUTDOWN and manual scram. All of the devices or sensors associated with these scram functions are simple on-off switches and, hence, calibration during operation is not applicable, i.e., the switch is either on or off.

The sensitivity of LPRM detectors decreases with exposure to neutron flux at a slow and approximately constant rate. The APRM system, which uses the LPRM readings to detect a change in thermal power, will be calibrated every seven days using a heat balance to compensate for this change in sensitivity. The RBM system uses the LPRM reading to detect a localized change in thermal power. It applies a correction factor based on the APRM output signal to determine the percent thermal power and therefore any change in LPRM sensitivity is compensated for by the APRM calibration. The technical specification limits of CMFLPD, CPR, and APLHGR are determined by the use of the process computer or other backup methods. These methods use LPRM readings and TIP data to determine the power distribution.

Compensation in the process computer for changes in LPRM sensitivity will be made by performing a full core TIP traverse to update the computer calculated LPRM correction factors every 1000 effective full power hours.

As a minimum the individual LPRM meter readings will be adjusted at the beginning of each operating cycle before reaching 100 percent power.

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BFN
Unit 3

3.1/4.1-20

AMENDMENT NO. 170



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 223 TO FACILITY OPERATING LICENSE NO. DPR-33

AMENDMENT NO. 238 TO FACILITY OPERATING LICENSE NO. DPR-52

AMENDMENT NO. 197 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 May 11, 1995, the Tennessee Valley Authority (TVA, the licensee) submitted an application to amend Facility Operating Licenses DPR-33, DPR-52, and DPR-68 for the Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3. This proposed amendment revises the Technical Specifications (TS) to reflect a design change that adds a scram air header low pressure trip function on BFN Unit 3, and clarifies the description of the scram discharge volume (SDV) high water level bypass in BFN Units 1, 2, and 3. Supplemental information provided by the licensee on June 30, 1995 does not affect the staff's proposed finding of no significant hazards considerations.

2.0 BACKGROUND

The proposed design and TS changes are the result of a BFN Unit 3 event that occurred on June 28, 1980. During that event, 76 control rods in BFN Unit 3 failed to fully insert during a routine shutdown. Two additional manual scrams followed by an automatic scram were required before all control rods were fully inserted. The total time that elapsed from the initial scram until all rods were inserted was approximately 15 minutes.

The NRC's investigation showed that deficiencies in the boiling water reactor (BWR) design caused this event. To recommend corrective measures for the identified deficiencies, the NRC issued Bulletin (IEB) 80-17, "Failure of 76 of 185 Control Rods to Fully Insert During a Scram at a BWR." In IEB 80-17, the NRC staff requested boiling water reactor (BWR) licensees to install a system to continuously monitor (with appropriate alarms) and record water levels in SDVs. In addition, as a short-term measure, the staff requested the BWR licensees to initiate an immediate manual scram when low pressure occurs in the control rod drive air system.

ENCLOSURE

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In a Safety Evaluation Report (SER) dated December 9, 1980, the staff documented its acceptance of the BWR Owners Group (BWROG) proposed long-term design changes that correct the deficiencies identified in IEB 80-17. The long-term design changes included the addition of an automatic scram on detection of low scram pilot air header pressure. At that time, all BWR licensees (except TVA) had committed to implement the long-term design modifications in accordance with this generic SER. On January 9, 1981, an Order for Modification of License was issued for BFN Units 1, 2, and 3 to install an automatic system to initiate control rod insertion on low pressure in the control air header, with specified performance criteria. The licensee documented completion of these modifications on February 10, 1982.

By letter dated October 6, 1982, the licensee provided a description of the long-term modifications, required to conform with the generic SER, that were being performed on BFN Unit 2, and would be performed on Units 1 and 3. The licensee completed the implementation of the long-term design modifications on Unit 2 in August 1986. On June 24, 1983, the NRC issued an Order requiring that the licensee install the long-term modifications for Units 1 and 3 during their Cycle 5 outages. In response, by letter dated June 27, 1984, the licensee informed the staff that it would complete the implementation of the long-term modifications to Unit 3 before restart from its Cycle 5 refueling outage.

From early 1985 until May 1991, all three Browns Ferry reactors were shut down to resolve a variety of deficiencies. BFN Unit 2 resumed operations in May 1991. The licensee expects to complete the current extended BFN Unit 3 recovery outage by the end of 1995. Installation of the scram pilot air header low pressure scram function are part of facility modifications required to conform to the criteria of the December 9, 1980 generic SER, and to fulfill the long-term requirements of the June 27, 1984 Order, and will be completed before BFN Unit 3 resumes operations.

The licensee is currently evaluating whether it will pursue recovery of BFN Unit 1. Prior to restarting that reactor, the licensee will be required to demonstrate conformance with the criteria established by the December 9, 1980 generic SER.

During the BFN Unit 3 recovery effort, the licensee reevaluated the necessity of the scram pilot air header low pressure scram function. By letter dated August 17, 1993, the licensee discussed how it intended to fulfill the generic SER criteria without the scram pilot air header low pressure scram function. A request to amend the TS to delete this function was submitted on September 30, 1993. This request was based on an assumption that control rod drive (CRD) stall flow rates would remain within acceptable limits. Operating experience on BFN Unit 2 indicated this assumption may not be supportable on a long-term basis. Therefore, on April 27, 1995, the licensee withdrew its request to remove the scram pilot air header low pressure scram function. On May 11, 1995, the licensee submitted proposed TS changes for the scram pilot air header low pressure function required to support BFN Unit 3 conformance with the generic SER criteria. This submittal, and supplemental information provided on June 30, 1995, is the subject of the evaluation described below.

3.0 EVALUATION

In reviewing the licensee's proposed design changes, the staff used the applicable criteria identified in the generic SER dated December 9, 1980, and IEB 80-17.

The proposed design and TS changes reflect a design change that adds the low air header pressure trip function to the BFN Unit 3 reactor protection system and related TS changes, and clarification of the description of the SDV high water level bypass in BFN Units 1, 2, and 3.

3.1 Design Change

The added scram pilot air header low pressure trip is one of the corrective measures identified in both IEB 80-17 and the generic SER. Like the high SDV water level trip, this trip is an anticipatory one that ensures a reactor scram is initiated while sufficient volume remains in the SDV to accept discharged water from the CRDs.

The scram inlet and outlet valves control the water needed for driving control rods during a scram. The valves are normally closed and opened when a scram is initiated. The valves are held closed by air pressure in the scram air header and opened by releasing air into the header.

If the air header system gradually or partially loses air pressure, the outlet scram valves could be partially opened without control rod motion, and opening of scram inlet valves. The rate at which water could leak into the SDV can be such that the volume could be filled with water before high level switches can initiate a reactor scram. This is called a fast-fill event.

The added scram pilot air header low pressure trip function prevents the fast-fill event by initiating a scram upon detection of low air header pressure in anticipation of this event. The air header pressure is set to initiate a trip at 50 psig, which is 10 psig above the opening pressure of the scram outlet valves. Four pressure sensors in two redundant logic channels (two sensors per logic channel) monitor the air header pressure. The licensee stated that the scram pilot air header low pressure trip function actuation logic consists of a one-out-of-two taken twice configuration and initiates the scram if the air header pressure drops below 50 psig. Additionally, by letter dated June 30, 1995, the licensee stated that the scram pilot air header low pressure trip function is a Class 1E, single failure proof design, and is composed of seismically and environmentally qualified safety-related components.

Based on the above, the staff concludes that the added scram pilot air header low pressure trip function complies with the staff-approved criteria identified in the generic SER and meets the criteria of a Class 1E system.

3.2 Technical Specification Change

The proposed TS change related to the added scram air header low pressure trip function provides for a functional test once every 6 months and an instrument

calibration once every 18 months. By letter dated June 30, 1995, the licensee stated that a channel that is being functionally tested, calibrated, or maintenance is placed in the trip condition. This places the reactor protection system in a half-scrum condition.

The licensee stated that the proposed functional test frequency (once every 6 months) and calibration test frequency (once every 18 months) for the Unit 3 scram pilot air header low pressure trip function are the same as that currently in the BFN Unit 2 TS for this function. The licensee also stated that the proposed functional test frequencies are based on industry generally accepted practices. The licensee further stated that it considered the following issues in determining the functional test frequency:

- Functional reliability previously demonstrated by this trip function on BFN Unit 2 during Cycles 6 and 7.
- Need for minimizing the radiation exposure associated with the functional testing of this function.
- Increased risk to plant availability while the plant is in a half-scrum condition during the performance of the functional testing versus the limited increase in reliability that would be obtained by more frequent functional testing.

The licensee also believes that it is highly unlikely that two sensors in one logic channel would experience an undetected failure during the 6 month period between functional tests.

In determining the calibration test frequency, the licensee stated that it performed setpoint scaling calculation to assure that there is an adequate margin between the required trip setpoints and the limiting safety system setting. The licensee also stated in its letter of June 30, 1995 that its setpoint calculation methodology was based on Regulatory Guide 1.105, "Instrument Setpoints for Safety Related Systems." Finally, the licensee stated that the Unit 2 scram pilot air header low pressure trip function have not shown as-found trip values below the minimum acceptable setpoint during the last two cycles of operation.

Based on the above, the staff finds that the proposed TS changes for Unit 3 that reflect the requirements for the low air header pressure trip function to be acceptable.

3.3 TS Clarifications

The description of the SDV high level bypass function in the TS for Units 2 and 3 has been revised to include the capability to reset the scram signals for SDV high-high water level and scram air header low pressure scram signals. In addition, minor wording changes have been made in the SDV bypass description in the TS for Units 1, 2, and 3. The staff finds that these proposed TS changes for Units 1, 2, and 3, are minor and clarify the description of the scram discharge volume high water level bypass, and are acceptable.

4.0 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.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes the surveillance requirements. The NRC 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 is 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 (60 FR 29889). 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.

6.0 CONCLUSION

The Commission has concluded, based upon 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 (3) issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: August 29, 1995

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