

November 18, 1991

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

Mr. Dan A. Nauman  
Senior Vice President, Nuclear Power  
Tennessee Valley Authority  
6N 38A Lookout Place  
1101 Market Street  
Chattanooga, Tennessee 37402-2801

Dear Mr. Nauman:

SUBJECT: ISSUANCE OF LICENSE AMENDMENTS (TAC NOS. 81038, 81039, AND 81040)  
(TS-295 AND 298) *m m m*

The Commission has issued the enclosed Amendment Nos. 187, 200, and 159 to Facility Operating Licenses Nos. DPR-33, DPR-52 and DPR-68 for the Browns Ferry Nuclear Plant BFNP, Units 1, 2 and 3, respectively. These amendments are in response to your application, dated July 12, 1991, to revise the BFNP Technical Specifications (TS) regarding the definition and operability requirements for Secondary Containment Integrity.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Thierry M. Ross, Senior Project Manager  
Project Directorate II-4  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 187 to License No. DPR-33
2. Amendment No. 200 to License No. DPR-52
3. Amendment No. 159 to License No. DPR-68
4. Safety Evaluation

cc w/enclosures:  
See next page

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*JFO 11/11*

Mr. Dan A. Nauman

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AMENDMENT NO. 187 FOR BROWNS FERRY UNIT 1 - DOCKET NO. 50-259,  
AMENDMENT NO. 200 FOR BROWNS FERRY UNIT 2 - DOCKET NO. 50-260, AND  
AMENDMENT NO. 159 FOR BROWNS FERRY UNIT 3 - DOCKET NO. 50-296  
DATED: November 18, 1991

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

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-259

BROWNS FERRY NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 187  
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 July 12, 1991, 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.

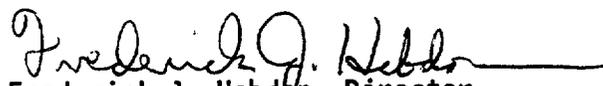
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-33 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 187, 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: November 18, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 187

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. \* Denotes overleaf page.

REMOVE

1.0-5  
1.0-6

INSERT

1.0-5  
1.0-6\*

1.0 DEFINITIONS (Cont'd)

- N. Rated Power - Rated power refers to operation at a reactor power of 3,293 MWt; this is also termed 100 percent power and is the maximum power level authorized by the operating license. Rated steam flow, rated coolant flow, rated neutron flux, and rated nuclear system pressure refer to the values of these parameters when the reactor is at rated power. Design power, the power to which the safety analysis applies, corresponds to 3,440 MWt.
- O. Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:
1. All nonautomatic containment isolation valves on lines connected to the reactor coolant systems or containment which are not required to be open during accident conditions are closed. These valves may be opened to perform necessary operational activities.
  2. At least one door in each airlock is closed and sealed.
  3. All automatic containment isolation valves are operable or each line which contains an inoperable isolation valve is isolated as required by Specification 3.7.D.2.
  4. All blind flanges and manways are closed.
- P. Secondary Containment Integrity
1. Secondary containment integrity means that the required unit reactor zones and refueling zone are intact and the following conditions are met:
    - a) At least one door in each access opening to the turbine building, control bay and out-of-doors is closed.
    - b) The standby gas treatment system is operable and can maintain 0.25 inches of water negative pressure in those areas where secondary containment integrity is stated to exist.
    - c) All secondary containment penetrations required to be closed during accident conditions are either:
      1. Capable of being closed by an operable secondary containment automatic isolation system, or
      2. Closed by at least one secondary containment automatic isolation valve deactivated in the isolated position.
  2. Reactor zone secondary containment integrity means the unit reactor building is intact and the following conditions are met:
    - a) At least one door between any opening to the turbine building, control bay and out-of-doors is closed.

1.0 DEFINITIONS (Cont'd)

P. Secondary Containment Integrity (Cont'd)

2. b) The standby gas treatment system is operable and can maintain 0.25 inches water negative pressure on the unit zone.
- c) All the unit reactor building ventilation system penetrations required to be closed during accident conditions are either:
  1. Capable of being closed by an operable reactor building ventilation system automatic isolation system, or
  2. Closed by at least one reactor building ventilation system automatic isolation valve deactivated in the isolated position.

If it is desirable for operational considerations, a reactor zone may be isolated from the other reactor zones and the refuel zone by maintaining at least one closed door in each common passageway between zones.\* Reactor zone safety-related features are not compromised by openings between adjacent units or refuel zone, unless it is desired to isolate a given zone.

3. Refuel zone secondary containment integrity means the refuel zone is intact and the following conditions are met:
  - a) At least one door in each access opening to the out-of-doors is closed.
  - b) The standby gas treatment system is operable and can maintain 0.25 inches water negative pressure on the refuel zone.
  - c) All refuel zone ventilation system penetrations required to be closed during accident conditions are either:
    1. Capable of being closed by an operable refuel zone ventilation system automatic isolation system, or
    2. Closed by at least one refuel zone ventilation system automatic isolation valve deactivated in the isolated position.

If it is desirable for operational considerations, the refuel zone may be isolated from the reactor zones by maintaining all hatches in place between the refuel floor and reactor zones and at least one closed door in each access between the refuel zone and the reactor building.\* Refuel zone safety-related features are not compromised by openings between the reactor building unless it is desired to isolate a given zone.

\*To effectively control zone isolation, all accesses to the affected zone will be locked or guarded to prevent uncontrolled passage to the unaffected zones.



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

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-260

BROWNS FERRY NUCLEAR PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 200  
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 July 12, 1991 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. 200, 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: November 18, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 200

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. \* Denotes overleaf page.

REMOVE

1.0-5  
1.0-6

INSERT

1.0-5  
1.0-6\*

1.0 DEFINITIONS (Cont'd)

- N. Rated Power - Rated power refers to operation at a reactor power of 3,293 MWt; this is also termed 100 percent power and is the maximum power level authorized by the operating license. Rated steam flow, rated coolant flow, rated neutron flux, and rated nuclear system pressure refer to the values of these parameters when the reactor is at rated power. Design power, the power to which the safety analysis applies, corresponds to 3,440 MWt.
- O. Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:
1. All nonautomatic containment isolation valves on lines connected to the reactor coolant systems or containment which are not required to be open during accident conditions are closed. These valves may be opened to perform necessary operational activities.
  2. At least one door in each airlock is closed and sealed.
  3. All automatic containment isolation valves are operable or each line which contains an inoperable isolation valve is isolated as required by Specification 3.7.D.2.
  4. All blind flanges and manways are closed.
- P. Secondary Containment Integrity
1. Secondary containment integrity means that the required unit reactor zones and refueling zone are intact and the following conditions are met:
    - a) At least one door in each access opening to the turbine building, control bay and out-of-doors is closed.
    - b) The standby gas treatment system is operable and can maintain 0.25 inches of water negative pressure in those areas where secondary containment integrity is stated to exist.
    - c) All secondary containment penetrations required to be closed during accident conditions are either:
      1. Capable of being closed by an operable secondary containment automatic isolation system, or
      2. Closed by at least one secondary containment automatic isolation valve deactivated in the isolated position.
  2. Reactor zone secondary containment integrity means the unit reactor building is intact and the following conditions are met:
    - a) At least one door between any opening to the turbine building, control bay and out-of-doors is closed.

1.0 DEFINITIONS (Cont'd)

P. Secondary Containment Integrity (Cont'd)

2. b) The standby gas treatment system is operable and can maintain 0.25 inches water negative pressure on the unit zone.
- c) All the unit reactor building ventilation system penetrations required to be closed during accident conditions are either:
  1. Capable of being closed by an operable reactor building ventilation system automatic isolation system, or
  2. Closed by at least one reactor building ventilation system automatic isolation valve deactivated in the isolated position.

If it is desirable for operational considerations, a reactor zone may be isolated from the other reactor zones and the refuel zone by maintaining at least one closed door in each common passageway between zones.\* Reactor zone safety-related features are not compromised by openings between adjacent units or refuel zone, unless it is desired to isolate a given zone.

3. Refuel zone secondary containment integrity means the refuel zone is intact and the following conditions are met:
  - a) At least one door in each access opening to the out-of-doors is closed.
  - b) The Standby Gas Treatment System is operable and can maintain 0.25 inches water negative pressure on the refuel zone.
  - c) All refuel zone ventilation system penetrations required to be closed during accident conditions are either:
    1. Capable of being closed by an operable refuel zone ventilation system automatic isolation system, or
    2. Closed by at least one refuel zone ventilation system automatic isolation valve deactivated in the isolated position.

If it is desirable for operational considerations, the refuel zone may be isolated from the reactor zones by maintaining all hatches in place between the refuel floor and reactor zones and at least one closed door in each access between the refuel zone and the reactor building.\* Refuel zone safety-related features are not compromised by openings between the reactor building unless it is desired to isolate a given zone.

\*To effectively control zone isolation, all accesses to the affected zone will be locked or guarded to prevent uncontrolled passage to the unaffected zones.



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

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-296

BROWNS FERRY NUCLEAR PLANT, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 159  
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 July 12, 1991, 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.

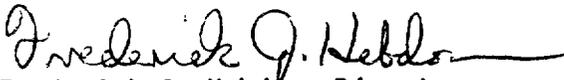
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-33 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No.159 , 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: November 18, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 159

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. \* Denotes overleaf pages.

REMOVE

1.0-5  
1.0-6  
3.7/4.7-15  
3.7/4.7-16

INSERT

1.0-5  
1.0-6\*  
3.7/4.7-15\*  
3.7/4.7-16

1.0 DEFINITIONS (Cont'd)

- N. Rated Power - Rated power refers to operation at a reactor power of 3,293 MWt; this is also termed 100 percent power and is the maximum power level authorized by the operating license. Rated steam flow, rated coolant flow, rated neutron flux, and rated nuclear system pressure refer to the values of these parameters when the reactor is at rated power. Design power, the power to which the safety analysis applies, corresponds to 3,440 MWt.
- O. Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:
1. All nonautomatic containment isolation valves on lines connected to the reactor coolant system or containment which are not required to be open during accident conditions are closed. These valves may be opened to perform necessary operational activities.
  2. At least one door in each airlock is closed and sealed.
  3. All automatic containment isolation valves are operable or each line which contains an inoperable isolation valve is isolated as required by Specification 3.7.D.2.
  4. All blind flanges and manways are closed.
- P. Secondary Containment Integrity
1. Secondary containment integrity means that the required unit reactor zones and refueling zone are intact and the following conditions are met:
    - a) At least one door in each access opening to the turbine building, control bay and out-of-doors is closed.
    - b) The standby gas treatment system is operable and can maintain 0.25 inches of water negative pressure in those areas where secondary containment integrity is stated to exist.
    - c) All secondary containment penetrations required to be closed during accident conditions are either:
      1. Capable of being closed by an operable secondary containment automatic isolation position, or
      2. Closed by at least one secondary containment automatic isolation valve deactivated in the isolated position.
  2. Reactor zone secondary containment integrity means the unit reactor building is intact and the following conditions are met:
    - a) At least one door between any opening to the turbine building, control bay and out-of-doors is closed.

1.0 DEFINITIONS (Cont'd)

P. Secondary Containment Integrity (Cont'd)

2. b) The Standby Gas Treatment System is operable and can maintain 0.25 inches water negative pressure on the unit zone.
- c) All the unit reactor building ventilation system penetrations required to be closed during accident conditions are either:
  1. Capable of being closed by an operable reactor building ventilation system automatic isolation system, or
  2. Closed by at least one reactor building ventilation system automatic isolation valve deactivated in the isolated position.

If it is desirable for operational considerations, a reactor zone may be isolated from the other reactor zones and the refuel zone by maintaining at least one closed door in each common passageway between zones.\* Reactor zone safety-related features are not compromised by openings between adjacent units or refuel zone, unless it is desired to isolate a given zone.

3. Refuel zone secondary containment integrity means the refuel zone is intact and the following conditions are met:
  - a) At least one door in each access opening to the out-of-doors is closed.
  - b) The standby gas treatment system is operable and can maintain 0.25 inches water negative pressure on the refuel zone.
  - c) All refuel zone ventilation system penetrations required to be closed during accident conditions are either:
    1. Capable of being closed by an operable refuel zone ventilation system automatic isolation system, or
    2. Closed by at least one refuel zone ventilation system automatic isolation valve deactivated in the isolated position.

If it is desirable for operational considerations, the refuel zone may be isolated from the reactor zones by maintaining all hatches in place between the refuel floor and reactor zones and at least one closed door in each access between the refuel zone and the reactor building.\* Refuel zone safety-related features are not compromised by openings between the reactor building unless it is desired to isolate a given zone.

\*To effectively control zone isolation, all accesses to the affected zone will be locked or guarded to prevent uncontrolled passage to the unaffected zones.

## LIMITING CONDITIONS FOR OPERATION

3.7.B. Standby Gas Treatment System

† 3. From and after the date that one train of the standby gas treatment system is made or found to be inoperable for any reason, REACTOR POWER OPERATION and fuel handling is permissible only during the succeeding 7 days unless such circuit is sooner made OPERABLE, provided that during such 7 days all active components of the other two standby gas treatment trains shall be operable.

4. If these conditions cannot be met:

- a. Suspend all fuel handling operations, core alterations, and activities with the potential to drain any reactor vessel containing fuel.

## SURVEILLANCE REQUIREMENTS

4.7.B. Standby Gas Treatment System

## 4.7.B.2 (Cont'd)

d. Each train shall be operated a total of at least 10 hours every month.

e. Test sealing of gaskets for housing doors shall be performed utilizing chemical smoke generators during each test performed for compliance with Specification 4.7.B.2.a and Specification 3.7.B.2.a.

3. a. Once per operating cycle automatic initiation of each branch of the standby gas treatment system shall be demonstrated from each unit's controls.

b. At least once per year manual operability of the bypass valve for filter cooling shall be demonstrated.

c. When one train of the standby gas treatment system becomes inoperable the other two trains shall be demonstrated to be OPERABLE within 2 hours and daily thereafter. †

### 3.7/4.7 CONTAINMENT SYSTEMS

#### LIMITING CONDITIONS FOR OPERATION

##### 3.7.B. Standby Gas Treatment System

###### 3.7.B.4 (Cont'd)

- b. Place all reactors in at least a HOT SHUTDOWN CONDITION within the next 12 hours and in a COLD SHUTDOWN CONDITION within the following 24 hours.

##### 3.7.C. Secondary Containment

- \* 1. Secondary containment integrity shall be maintained in the reactor zone at all times except as specified in 3.7.C.2.
  - \* LCO not applicable until just prior to loading fuel into the Unit 3 reactor vessel, provided the Unit 3 reactor zone is not required for secondary containment integrity for other units.
2. If reactor zone secondary containment integrity cannot be maintained the following conditions shall be met:
  - a. Suspend all fuel handling operations, core alterations, and activities with the potential to drain any reactor vessel containing fuel.
  - b. Restore reactor zone secondary containment integrity within 4 hours, or place all reactors in at least a HOT SHUTDOWN CONDITION within the next 12 hours and in a COLD SHUTDOWN CONDITION within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

##### 4.7.B. Standby Gas Treatment System

##### 4.7.C. Secondary Containment

1. Secondary containment surveillance shall be performed as indicated below:
  - a. Secondary containment capability to maintain 1/4 inch of water vacuum under calm wind (< 5 mph) conditions with a system inleakage rate of not more than 12,000 cfm, shall be demonstrated at each refueling outage prior to refueling.
2. After a secondary containment violation is determined, the standby gas treatment system will be operated immediately after the affected zones are isolated from the remainder of the secondary containment to confirm its ability to maintain the remainder of the secondary containment at 1/4-inch of water negative pressure under calm wind conditions.



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

ENCLOSURE 4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 187 TO FACILITY OPERATING LICENSE NO. DPR-33

AMENDMENT NO. 200 TO FACILITY OPERATING LICENSE NO. DPR-52

AMENDMENT NO. 159 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 July 12, 1991, the Tennessee Valley Authority (TVA), the licensee for Browns Ferry Nuclear Plant (BFNP), Units 1, 2 and 3, proposed to amend the Technical Specifications (TS) 1.0.P and 3.7.C. Specifically, the licensee requested a revision to Definition Section 1.0.P.1, Secondary Containment Integrity for Units 1, 2, and 3 to better define the zonal concept of the secondary containment and Section 1.0.P.2 for Unit 3 to correct typographical errors such that the definition for secondary containment integrity reads the same for all three units. The licensee also requested a revision to limiting conditions for operation (LCO) Section 3.7.C.1 for Unit 3 to allow separating the Unit 3 reactor zone from the secondary containment envelope under certain conditions (prior to fuel loading) to expedite Unit 3 reconstruction efforts during Unit 2 operation. All three BFNP reactor zones and the multiplant refueling floor co-exist within the same building. In order to accommodate Unit 3 construction activities during Unit 2 operation, TVA plans to upgrade the walls separating the Unit 3 reactor zone from the refueling floor and the Unit 2 reactor zone, thereby separating the Unit 3 reactor zone from the secondary containment envelope around Unit 2. However, current TS do not recognize this plant configuration.

2.0 EVALUATION

The licensee indicated that the current Definition 1.0.P.1 for Units 1, 2, and 3 of secondary containment is confusing in that the secondary containment is discussed in terms of reactor building and not in terms of unit reactor zones and the refueling zone. The proposed change to this section does not reflect a change to the secondary containment boundary, but serves to better define the boundary in terms of zones which is consistent with Definitions 1.0.P.2 (reactor zone secondary containment) and 1.0.P.3 (refueling zone secondary containment). The licensee considers this change to be administrative in nature and therefore justified. The staff concurs with the licensee's rationale and finds the proposed change acceptable, since it does not change secondary containment requirements.

The licensee proposed revision to definition 1.0.P.2 (for Unit 3) to correct typographical errors so that the definition of secondary containment integrity reads the same for all three units is also administrative in nature and therefore acceptable.

The current LCO 3.7.C.1 requires that the "secondary containment integrity shall be maintained in the reactor zone at all times except as specified in 3.7.C.2." The licensee proposed changes to 3.7.C.1 for Unit 3 would add a note which modifies the applicability of 3.7.C.1 as

"LCO not applicable until just prior to loading fuel into the Unit 3 reactor vessel, provided the Unit 3 reactor zone is not required for secondary containment integrity for other units."

The BFNP Final Safety Analysis Report (FSAR) provides a performance based criteria that requires the secondary containment to be designed such that the standby gas treatment system (SGTS) will be able to maintain the secondary containment at a negative 0.25-inch of water pressure following a design basis earthquake (DBE). The primary purpose of the secondary containment is to limit the release of radioactive effluents during and following a design basis accident (DBA). The licensee indicated that although the probability of a DBA and a DBE occurring simultaneously is extremely low, it upgraded secondary containment penetration seals in order to conform with FSAR commitment. BFNP's secondary containment penetration program resolved this concern for Unit 2 operations by an evaluation of the penetrations through secondary containment whose boundary was formed by the outer boundary of the reactor building. However, the program did not address inter-zonal penetrations between the refueling floor and other reactor zones.

The licensee indicated that the potential flow paths between the Unit 3 reactor zone and the refueling floor, and between the Unit 3 and the Unit 2 reactor zones will be designed and modified as required, to ensure that the total post-DBE inleakage flow into the secondary containment boundary required for Unit 1 and 2 operation (Units 1 and 2 zones and the refueling floor) would be within the capability of the SGTS to maintain the required 0.25-inch of water vacuum. These modifications will ensure that the safety objectives of the secondary containment system will be met for operations within Units 1 and 2 and any potential release of radioactive material due to operations of these units will be within the guideline values given in the applicable parts of 10 CFR 20 and 10 CFR 100.

Based on the discussion above, the staff finds the proposed TS changes acceptable. If Unit 3 is defueled, and the Unit 3 reactor zone is not required for the secondary containment integrity of Units 1 and 2 (i.e., Unit 3 inter-zonal walls designed and modified as required), then there is no necessity to maintain secondary containment around the Unit 3 reactor zone and no impact on the operability of secondary containment for the other unit(s) requiring secondary containment. The proposed TS change does not change the method of isolation or

operation of secondary containment or method of operating the SGTS which is used to process radioactive effluents. The allowable SGTS flow and corresponding reactor building in-leakage will be maintained in accordance with TS requirements and thus there is no impact on either the 10 CFR 20 or 10 CFR 100 dose analysis. The proposed changes do not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different accident or reduce the margin of safety.

Based on this evaluation, the staff concludes that the following TS changes are acceptable: Definition 1.0.P revised to better define the zonal concept of secondary containment for Units 1, 2, and 3; Definition 1.0.P.2 corrected for a typographical error for Unit 3 only; and limiting condition for operation 3.7.C for Unit 3 revised to allow separating the Unit 3 reactor zone from the secondary containment envelope under certain conditions prior to fuel load.

### 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 amendment changes a requirement with respect to installation and use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 49926). Accordingly, the amendment meets 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 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.

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