

Mr. J. A. Scalice
 Chief Nuclear Officer and
 Executive Vice President
 Tennessee Valley Authority
 6A Lookout Place
 1101 Market Street
 Chattanooga, TN 37402-2801

September 27, 1999

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNIT 3 - ISSUANCE OF AMENDMENT
 REGARDING OSCILLATION POWER RANGE MONITOR (TAC NO. MA5976)

Dear Mr. Scalice:

The Commission has issued the enclosed Amendment No. 221 to Facility Operating License No. DPR-68 for the Browns Ferry Nuclear Plant, Unit 3. This amendment is in response to your application dated July 28, 1999 (TS-398).

Installation and operability of the Oscillation Power Range Monitor trip function fulfills Unit 3's requirements related to Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors."

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

Sincerely,
Original signed by:
 William O. Long, Senior Project Manager, Section 2
 Project Directorate II
 Division of Licensing Project Management

Docket No. 50- 296

Enclosures: 1. Amendment No. 221 to
 License No. DPR-68
 2. Safety Evaluation

cc w/enclosures: See next page

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

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Mr. J. A. Scalice
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Executive Vice President
Tennessee Valley Authority
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Sincerely,

A handwritten signature in black ink, appearing to read "William O. Long".

William O. Long, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management

Docket No. 50- 296

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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. 221
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 28, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-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. 221 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented at the end of the Cycle 9 outage.

FOR THE NUCLEAR REGULATORY COMMISSION



Sheri R. Peterson, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: **September 27, 1999**

ATTACHMENT TO LICENSE AMENDMENT NO. 221

FACILITY OPERATING LICENSE NO. DPR-68

DOCKET NO. 50- 296

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

3.3-1	3.3-1
3.3-2	3.3-2
3.3-3	3.3-3
3.3-6	3.3-6
3.3-8	3.3-8
3.3-9	3.3-9
3.4-1	3.4-1
3.4-2	3.4-2
3.4-3	3.4-3
3.4-4	3.4-4
B 3.3-9	B 3.3-9
---	B 3.3-9a
B 3.3-14	B 3.3-14
B 3.3-15	B 3.3-15
---	B 3.3-15a
---	B 3.3-15b
B 3.3-30	B 3.3-30
B 3.3-32	B 3.3-32
B 3.3-34	B 3.3-34
B 3.3-35	B 3.3-35
---	B 3.3-35a
B 3.3-44	B 3.3-44
---	B 3.3-45a
B 3.3-46	B 3.3-46
---	B 3.3-46a
B 3.4-4	B 3.4-4
B 3.4-5	B 3.4-5
B 3.4-5a	---
B 3.4-6	B 3.4-6
B 3.4-7	B 3.4-7
B 3.4-8	B 3.4-8
B 3.4-9	B 3.4-9
B 3.4-10	B 3.4-10

3.3 INSTRUMENTATION

3.3.1.1 Reactor Protection System (RPS) Instrumentation

LCO 3.3.1.1 The RPS instrumentation for each Function in Table 3.3.1.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.1.1-1.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required channels inoperable.	A.1 Place channel in trip. <u>OR</u>	12 hours
	A.2 -----NOTE----- Not applicable for Functions 2.a, 2.b, 2.c, 2.d, or 2.f. ----- Place associated trip system in trip.	

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
G. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	G.1 Be in MODE 3.	12 hours
H. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	H.1 Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately
I. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	I.1 Initiate alternate method to detect and suppress thermal hydraulic instability oscillations.	12 hours
	<u>AND</u> I.2 Restore required channels to OPERABLE.	120 days
J. Required Action and associated Completion Time of Condition I not met.	J.1 Be in MODE 2	4 hours

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.10	Perform CHANNEL CALIBRATION.	184 days
SR 3.3.1.1.11	(Deleted)	
SR 3.3.1.1.12	Perform CHANNEL FUNCTIONAL TEST.	24 months
SR 3.3.1.1.13	-----NOTE----- Neutron detectors are excluded. ----- Perform CHANNEL CALIBRATION.	24 months
SR 3.3.1.1.14	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR 3.3.1.1.15	Verify Turbine Stop Valve - Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure - Low Functions are not bypassed when THERMAL POWER is \geq 30% RTP.	24 months
SR 3.3.1.1.16	-----NOTE----- For Function 2.a, not required to be performed when entering MODE 2 from MODE 1 until 12 hours after entering MODE 2. ----- Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.1.1.17	Verify OPRM is not bypassed when APRM Simulated Thermal Power is \geq 25% and recirculation drive flow is $<$ 60% of rated recirculation drive flow.	24 months

Table 3.3.1.1-1 (page 2 of 3)
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. Average Power Range Monitors (continued)					
d. Inop	1,2	3(b)	G	SR 3.3.1.1.16	NA
e. 2-Out-Of-4 Voter	1,2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.14 SR 3.3.1.1.16	NA
f. OPRM Upscale	1	3(b)	I	SR 3.3.1.1.1 SR 3.3.1.1.7 SR 3.3.1.1.13 SR 3.3.1.1.16 SR 3.3.1.1.17	NA
3. Reactor Vessel Steam Dome Pressure - High	1,2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.8 SR 3.3.1.1.10 SR 3.3.1.1.14	≤ 1090 psig
4. Reactor Vessel Water Level - Low, Level 3	1,2	2	G	SR 3.3.1.1.1 SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14	≥ 528 inches above vessel zero
5. Main Steam Isolation Valve - Closure	1	8	F	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14	≤ 10% closed
6. Drywell Pressure - High	1,2	2	G	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14	≤ 2.5 psig
7. Scram Discharge Volume Water Level - High					
a. Resistance Temperature Detector	1,2	2	G	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14	≤ 50 gallons
	5(a)	2	H	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14	≤ 50 gallons

(continued)

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies

(b) Each APRM channel provides inputs to both trip systems.

Table 3.3.1.1-1 (page 3 of 3)
Reactor Protection System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION D.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
7. Scram Discharge Volume Water Level - High (continued)					
b. Float Switch	1,2	2	G	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14	≤ 50 gallons
	5(a)	2	H	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14	≤ 50 gallons
8. Turbine Stop Valve - Closure	≥ 30% RTP	4	E	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14 SR 3.3.1.1.15	≤ 10% closed
9. Turbine Control Valve Fast Closure, Trip Oil Pressure - Low	≥ 30% RTP	2	F	SR 3.3.1.1.8 SR 3.3.1.1.13 SR 3.3.1.1.14 SR 3.3.1.1.15	≥ 550 psig
10. Reactor Mode Switch - Shutdown Position	1,2	1	G	SR 3.3.1.1.12 SR 3.3.1.1.14	NA
	5(a)	1	H	SR 3.3.1.1.12 SR 3.3.1.1.14	NA
11. Manual Scram	1,2	1	G	SR 3.3.1.1.8 SR 3.3.1.1.14	NA
	5(a)	1	H	SR 3.3.1.1.8 SR 3.3.1.1.14	NA
12. RPS Channel Test Switches	1,2	2	G	SR 3.3.1.1.4	NA
	5(a)	2	H	SR 3.3.1.1.4	NA
13. Low Scram Pilot Air Header Pressure	1,2	2	G	SR 3.3.1.1.13 SR 3.3.1.1.14 SR 3.3.1.1.16	≥ 50 psig
	5(a)	2	H	SR 3.3.1.1.13 SR 3.3.1.1.14 SR 3.3.1.1.16	≥ 50 psig

(a) With any control rod withdrawn from a core cell containing one or more fuel assemblies.

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.1 Recirculation Loops Operating

LCO 3.4.1 Two recirculation loops with matched flows shall be in operation.

OR

One recirculation loop may be in operation provided the following limits are applied when the associated LCO is applicable:

- a. LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," single loop operation limits specified in the COLR;
- b. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," single loop operation limits specified in the COLR;
- c. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," Function 2.b (Average Power Range Monitors Flow Biased Simulated Thermal Power - High), Allowable Value of Table 3.3.1.1-1 is reset for single loop operation;

APPLICABILITY: MODES 1 and 2.



ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 Satisfy the requirements of the LCO.	24 hours
B. Required Action and associated Completion Time of Condition A not met. <u>OR</u> No recirculation loops in operation.	B.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.1.1</p> <p>-----NOTE----- Not required to be performed until 24 hours after both recirculation loops are in operation. -----</p> <p>Verify recirculation loop jet pump flow mismatch with both recirculation loops in operation is:</p> <p>a. $\leq 10\%$ of rated core flow when operating at $< 70\%$ of rated core flow; and</p> <p>b. $\leq 5\%$ of rated core flow when operating at $\geq 70\%$ of rated core flow.</p>	<p>24 hours</p>

Figure 3.4.1-1
(Deleted Per TS 398)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY
(continued)

Average Power Range Monitor

The APRM channels provide the primary indication of neutron flux within the core and respond almost instantaneously to neutron flux increases. The APRM channels receive input signals from the local power range monitors (LPRMs) within the reactor core to provide an indication of the power distribution and local power changes. The APRM channels average these LPRM signals to provide a continuous indication of average reactor power from a few percent to greater than RTP. Each APRM also includes an Oscillation Power Range Monitor (OPRM) Upscale Function which monitors small groups of LPRM signals to detect thermal-hydraulic instabilities.

The APRM System is divided into four APRM channels and four 2-out-of-4 voter channels. Each APRM channel provides inputs to each of the four voter channels. The four voter channels are divided into two groups of two each, with each group of two providing inputs to one RPS trip system. The system is designed to allow one APRM channel, but no voter channels, to be bypassed. A trip from any one unbypassed APRM will result in a "half-trip" in all four of the voter channels, but no trip inputs to either RPS trip system. APRM trip Functions 2.a, 2.b, 2.c and 2.d are voted independently from OPRM Upscale Function 2.f. Therefore, any Function 2.a, 2.b, 2.c, or 2.d trip from any two unbypassed APRM channels will result in a full trip in each of the four voter channels, which in turn results in two trip inputs to each RPS trip system logic channel (A1, A2, B1, or B2). Similarly, a Function 2.f trip from any two unbypassed APRM channels will result in a full trip from each of the four voter channels. Three of the four APRM channels and all four of the voter channels are required to be OPERABLE to ensure that no single failure will preclude a scram on a valid signal. In addition, to provide adequate coverage of the entire core, consistent with the design bases for the APRM Functions 2.a, 2.b, and 2.c, at least twenty (20) LPRM inputs, with at least

(continued)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY

Average Power Range Monitor (continued)

three (3) LPRM inputs from each of the four axial levels at which the LPRMs are located, must be operable for each APRM channel. For the OPRM Upscale Function 2.f, LPRMs are assigned to "cells" with either 3 or 4 detectors, with a total of 33 "cells" assigned to each OPRM channel. A minimum of 23 cells, each with a minimum of 2 LPRMs must be OPERABLE for the OPRM Upscale Function 2.f to be OPERABLE.

(continued)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY
(continued)

2.d. Average Power Range Monitor - Inop

Three of the four APRM channels are required to be OPERABLE for each of the APRM Functions. This Function (Inop) provides assurance that the minimum number of APRMs are OPERABLE. For any APRM channel, any time its mode switch is in any position other than "Operate," an APRM module is unplugged, or the automatic self-test system detects a critical fault with the APRM channel, an Inop trip is sent to all four voter channels. Inop trips from two or more unbypassed APRM channels result in a trip output from all four voter channels to their associated trip system.

This Function was not specifically credited in the accident analysis, but it is retained for the overall redundancy and diversity of the RPS as required by the NRC approved licensing basis.

There is no Allowable Value for this Function.

This Function is required to be OPERABLE in the MODES where the APRM Functions are required.

(continued)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY
(continued)

2.e. 2-Out-Of-4 Voter

The 2-Out-Of-4 Voter Function provides the interface between the APRM Functions, including the OPRM Upscale Function, and the final RPS trip system logic. As such, it is required to be OPERABLE in the MODES where the APRM Functions are required and is necessary to support the safety analysis applicable to each of those Functions. Therefore, the 2-Out-Of-4 Voter Function needs to be OPERABLE in MODES 1 and 2.

All four voter channels are required to be OPERABLE. Each voter channel includes self-diagnostic functions. If any voter channel detects a critical fault in its own processing, a trip is issued from that voter channel to the associated trip system.

The 2-Out-Of-4 Voter Function votes APRM Functions 2.a, 2.b, 2.c, and 2.d independently of Function 2.f. The voter also includes separate outputs to RPS for the two independently voted sets of Functions, each of which is redundant (four total outputs). The Voter Function 2.e must be declared inoperable if any of its functionality is inoperable. However, due to the independent voting of APRM trips, and the redundancy of outputs, there may be conditions where the Voter Function 2.e is inoperable, but trip capability for one or more of the other APRM Functions through that voter is still maintained. This may be considered when determining the condition of other APRM Functions resulting from partial inoperability of the Voter Function 2.e.

There is no Allowable Value for this Function.

(continued)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY
(continued)

2.f. Oscillation Power Range Monitor (OPRM) Upscale

The OPRM Upscale Function provides compliance with GDC 10 and GDC 12, thereby providing protection from exceeding the fuel MCPR safety limit (SL) due to anticipated thermal hydraulic power oscillations.

References 13, 14, and 15 describe three algorithms for detecting thermal hydraulic instability related neutron flux oscillations: the period based detection algorithm, the amplitude based algorithm, and the growth rate algorithm. All three are implemented in the OPRM Upscale Function, but the safety analysis takes credit only for the period based detection algorithm. The remaining algorithms provide defense in depth and additional protection against unanticipated oscillations. OPRM Upscale Function OPERABILITY for Technical Specification purposes is based only on the period based detection algorithm.

The OPRM Upscale Function receives input signals from the local power range monitors (LPRMs) within the reactor core, which are combined into "cells" for evaluation of the OPRM algorithms.

The OPRM Upscale Function is required to be OPERABLE when the plant is in a region of power flow operation where anticipated events could lead to thermal hydraulic instability and related neutron flux oscillations. Within this region, the automatic trip is enabled when THERMAL POWER, as indicated by the APRM Simulated Thermal Power, is $\geq 25\%$ RTP and reactor core flow, as indicated by recirculation drive flow is $< 60\%$ of rated flow, the operating region where actual thermal hydraulic oscillations may occur. Requiring the OPRM Upscale Function to be OPERABLE in MODE 1 provides consistency with operability requirements for other APRM functions and assures that the OPRM Upscale Function is OPERABLE whenever reactor power could increase into the region of concern without operator action.

(continued)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY

2.f. Oscillation Power Range Monitor (OPRM) Upscale
(continued)

An OPRM Upscale trip is issued from an APRM channel when the period based detection algorithm in that channel detects oscillatory changes in the neutron flux, indicated by the combined signals of the LPRM detectors in a cell, with period confirmations and relative cell amplitude exceeding specified setpoints. One or more cells in a channel exceeding the trip conditions will result in a channel trip. An OPRM Upscale trip is also issued from the channel if either the growth rate or amplitude based algorithms detect growing oscillatory changes in the neutron flux for one or more cells in that channel.

Three of the four channels are required to be OPERABLE. Each channel is capable of detecting thermal hydraulic instabilities, by detecting the related neutron flux oscillations, and issuing a trip signal before the MCPR SL is exceeded. There is no allowable value for this function.

(continued)

BASES

ACTIONS
(continued)

A.1 and A.2

Because of the diversity of sensors available to provide trip signals and the redundancy of the RPS design, an allowable out of service time of 12 hours has been shown to be acceptable (Ref. 9 and 12) to permit restoration of any inoperable channel to OPERABLE status. However, this out of service time is only acceptable provided the associated Function's inoperable channel is in one trip system and the Function still maintains RPS trip capability (refer to Required Actions B.1, B.2, and C.1 Bases). If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel or the associated trip system must be placed in the tripped condition per Required Actions A.1 and A.2. Placing the inoperable channel in trip (or the associated trip system in trip) would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. Alternatively, if it is not desired to place the channel (or trip system) in trip (e.g., as in the case where placing the inoperable channel in trip would result in a full scram), Condition D must be entered and its Required Action taken.

As noted, Action A.2 is not applicable for APRM Functions 2.a, 2.b, 2.c, 2.d, or 2.f. Inoperability of one required APRM channel affects both trip systems. For that condition, Required Action A.1 must be satisfied, and is the only action (other than restoring operability) that will restore capability to accommodate a single failure.

Inoperability of more than one required APRM channel of the same trip function results in loss of trip capability and entry into Condition C, as well as entry into Condition A for each channel.

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

The 6 hour Completion Time is judged acceptable based on the remaining capability to trip, the diversity of the sensors available to provide the trip signals, the low probability of extensive numbers of inoperabilities affecting all diverse Functions, and the low probability of an event requiring the initiation of a scram.

Alternately, if it is not desired to place the inoperable channels (or one trip system) in trip (e.g., as in the case where placing the inoperable channel or associated trip system in trip would result in a scram or RPT), Condition D must be entered and its Required Action taken.

As noted, Condition B is not applicable for APRM Functions 2.a, 2.b, 2.c, 2.d, or 2.f. Inoperability of an APRM channel affects both trip systems and is not associated with a specific trip system as are the APRM 2-out-of-4 voter and other non-APRM channels for which Condition B applies. For an inoperable APRM channel, Required Action A.1 must be satisfied, and is the only action (other than restoring operability) that will restore capability to accommodate a single failure. Inoperability of a Function in more than one required APRM channel results in loss of trip capability for that Function and entry into Condition C, as well as entry into Condition A for each channel. Because Conditions A and C provide Required Actions that are appropriate for the inoperability of APRM Functions 2.a, 2.b, 2.c, 2.d, or 2.f, and these functions are not associated with specific trip systems as are the APRM 2-out-of-4 voter and other non-APRM channels, Condition B does not apply.

(continued)

BASES

ACTIONS
(continued)

D.1

Required Action D.1 directs entry into the appropriate Condition referenced in Table 3.3.1.1-1. The applicable Condition specified in the Table is Function and MODE or other specified condition dependent and may change as the Required Action of a previous Condition is completed. Each time an inoperable channel has not met any Required Action of Condition A, B, or C and the associated Completion Time has expired, Condition D will be entered for that channel and provides for transfer to the appropriate subsequent Condition.

E.1, F.1, G.1, and J.1

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. The allowed Completion Times are reasonable, based on operating experience, to reach the specified condition from full power conditions in an orderly manner and without challenging plant systems. In addition, the Completion Time of Required Action E.1 is consistent with the Completion Time provided in LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)."

(continued)

BASES

ACTIONS
(continued)

H.1

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. This is done by immediately initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and are, therefore, not required to be inserted. Action must continue until all insertable control rods in core cells containing one or more fuel assemblies are fully inserted.

I.1

If OPRM Upscale trip capability is not maintained, Condition I exists. Reference 12 justified use of alternate methods to detect and suppress oscillations for a limited period of time. The alternate methods are procedurally established consistent with the guidelines identified in Reference 17 requiring manual operator action to scram the plant if certain predefined events occur. The 12 hour allowed action time is based on engineering judgment to allow orderly transition to the alternate methods while limiting the period of time during which no automatic or alternate detect and suppress trip capability is formally in place. Based on the small probability of an instability event occurring at all, the 12 hours is judged to be reasonable.

(continued)

BASES

ACTIONS
(continued)

I.2

The alternate method to detect and suppress oscillations implemented in accordance with I.1 was evaluated (Reference 12) based on use up to 120 days only. The evaluation, based on engineering judgment, concluded that the likelihood of an instability event that could not be adequately handled by the alternate methods during this 120 day period was negligibly small. The 120 day period is intended to be an outside limit to allow for the case where design changes or extensive analysis might be required to understand or correct some unanticipated characteristic of the instability detection algorithms or equipment. This action is not intended and was not evaluated as a routine alternative to returning failed or inoperable equipment to OPERABLE status. Correction of routine equipment failure or inoperability is expected to normally be accomplished within the completion times allowed for Actions for Conditions A and B.

SURVEILLANCE
REQUIREMENTS

As noted at the beginning of the SRs, the SRs for each RPS instrumentation Function are located in the SRs column of Table 3.3.1.1-1.

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains RPS trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 3) assumption of the average time required to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the RPS will trip when necessary.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.3.1.1.11

(Deleted)

SR 3.3.1.1.14

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required trip logic for a specific channel. The functional testing of control rods (LCO 3.1.3), and SDV vent and drain valves (LCO 3.1.8), overlaps this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience with these components supports performance of the Surveillance at the 24 month Frequency.

The LOGIC SYSTEM FUNCTIONAL TEST for APRM Function 2.e simulates APRM and OPRM trip conditions at the 2-out-of-4 voter channel inputs to check all combinations of two tripped inputs to the 2-out-of-4 logic in the voter channels and APRM related redundant RPS relays.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

(continued)

SR 3.3.1.1.17

This SR ensures that scrams initiated from OPRM Upscale Function (Function 2.f) will not be inadvertently bypassed when THERMAL POWER, as indicated by the APRM Simulated Thermal Power, is $\geq 25\%$ RTP and core flow, as indicated by recirculation drive flow, is $< 60\%$ rated core flow. This normally involves confirming the bypass setpoints. Adequate margins for the instrument setpoint methodologies are incorporated into the actual setpoint. The actual surveillance ensures that the OPRM Upscale Function is enabled (not bypassed) for the correct values of APRM Simulated Thermal Power and recirculation drive flow. Other surveillances ensure that the APRM Simulated Thermal Power and recirculation flow properly correlate with THERMAL POWER and core flow, respectively.

If any bypass setpoint is nonconservative (i.e., the OPRM Upscale Function is bypassed when APRM Simulated Thermal Power $\geq 25\%$ RTP and recirculation drive flow $< 60\%$ rated), then the affected channel is considered inoperable for the OPRM Upscale Function. Alternatively, the bypass setpoint may be adjusted to place the channel in a conservative condition (unbypass). If placed in the unbypassed condition, this SR is met and the channel is considered OPERABLE.

The frequency of 24 months is based on engineering judgment and reliability of the components.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 7.2.
2. FSAR, Chapter 14.
3. NEDO-23842, "Continuous Control Rod Withdrawal in the Startup Range," April 18, 1978.
4. FSAR, Appendix N.
5. FSAR, Section 14.6.2.
6. FSAR, Section 6.5.
7. FSAR, Section 14.5.
8. P. Check (NRC) letter to G. Lainas (NRC), "BWR Scram Discharge System Safety Evaluation," December 1, 1980.
9. NEDC-30851-P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.
10. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
11. MED-32-0286, "Technical Specification Improvement Analysis for Browns Ferry Nuclear Plant, Unit 2," October 1995.
12. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.
13. NEDO-31960-A, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.

(continued)

BASES

REFERENCES
(continued)

14. NEDO-31960-A, Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995.
 15. NEDO-32465-A, "BWR Owners' Group Long-Term Stability Detect and Suppress Solutions Licensing Basis Methodology and Reload Applications," August 1996.
 16. NEDC-32410P-A, Supplement 1, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," August 1996.
 17. Letter, L.A. England (BWROG) to M.J. Virgilio, "BWR Owners' Group Guidelines for Stability Interim Corrective Action," June 6, 1994.
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BASES

APPLICABLE
SAFETY ANALYSES
(continued)

Plant specific LOCA analyses have been performed assuming only one operating recirculation loop. These analyses have demonstrated that, in the event of a LOCA caused by a pipe break in the operating recirculation loop, the Emergency Core Cooling System response will provide adequate core cooling, provided the APLHGR requirements are modified accordingly (Refs. 7 and 8).

The transient analyses of Chapter 14 of the FSAR have also been performed for single recirculation loop operation (Ref. 7) and demonstrate sufficient flow coastdown characteristics to maintain fuel thermal margins during the abnormal operational transients analyzed provided the MCPR requirements are modified. During single recirculation loop operation, modification to the Reactor Protection System (RPS) average power range monitor (APRM) instrument setpoint is also required to account for the different relationships between recirculation drive flow and reactor core flow. The APLHGR and MCPR setpoints for single loop operation are specified in the COLR. The APRM Flow Biased Simulated Thermal Power-High setpoint is in LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation."

Recirculation loops operating satisfies Criterion 2 of the NRC Policy Statement (Ref. 6).

(continued)

BASES (continued)

LCO

Two recirculation loops are required to be in operation with their flows matched within the limits specified in SR 3.4.1.1 to ensure that during a LOCA caused by a break of the piping of one recirculation loop the assumptions of the LOCA analysis are satisfied. With the limits specified in SR 3.4.1.1 not met, the recirculation loop with the lower flow must be considered not in operation. With only one recirculation loop in operation, modifications to the required APLHGR Limits (LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)"), MCPR limits (LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)"), and APRM Flow Biased Simulated Thermal Power-High Setpoint (LCO 3.3.1.1) may be applied to allow continued operation consistent with the assumptions of References 7 and 8.

APPLICABILITY

In MODES 1 and 2, requirements for operation of the Reactor Coolant Recirculation System are necessary since there is considerable energy in the reactor core and the limiting design basis transients and accidents are assumed to occur.

In MODES 3, 4, and 5, the consequences of an accident are reduced and the coastdown characteristics of the recirculation loops are not important.

(continued)

BASES (continued)

ACTIONS

A.1

With the requirements of the LCO not met, the recirculation loops must be restored to operation with matched flows within 24 hours. A recirculation loop is considered not in operation when the pump in that loop is idle or when the mismatch between total jet pump flows of the two loops is greater than required limits. The loop with the lower flow must be considered not in operation. Should a LOCA occur with one recirculation loop not in operation, the core flow coastdown and resultant core response may not be bounded by the LOCA analyses. Therefore, only a limited time is allowed to restore the inoperable loop to operating status.

Alternatively, if the single loop requirements of the LCO are applied to the operating limits and RPS setpoints, operation with only one recirculation loop would satisfy the requirements of the LCO and the initial conditions of the accident sequence.

(continued)

BASES

ACTIONS

A.1 (continued)

The 24 hour Completion Time is based on the low probability of an accident occurring during this time period, on a reasonable time to complete the Required Action, and on frequent core monitoring by operators allowing abrupt changes in core flow conditions to be quickly detected.

This Required Action does not require tripping the recirculation pump in the lowest flow loop when the mismatch between total jet pump flows of the two loops is greater than the required limits. However, in cases where large flow mismatches occur, low flow or reverse flow can occur in the low flow loop jet pumps, causing vibration of the jet pumps. If zero or reverse flow is detected, the condition should be alleviated by changing pump speeds to re-establish forward flow or by tripping the pump.

(continued)

BASES

ACTIONS
(continued)

B.1

With no recirculation loops in operation while in MODES 1 or 2 or the Required Action and associated Completion Time of Condition A not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 12 hours. In this condition, the recirculation loops are not required to be operating because of the reduced severity of DBAs and minimal dependence on the recirculation loop coastdown characteristics. The allowed Completion Time of 12 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.4.1.1

This SR ensures the recirculation loops are within the allowable limits for mismatch. At low core flow (i.e., < 70% of rated core flow), the MCPR requirements provide larger margins to the fuel cladding integrity Safety Limit such that the potential adverse effect of early boiling transition during a LOCA is reduced. A larger flow mismatch can therefore be allowed when core flow is < 70% of rated core flow. The recirculation loop jet pump flow, as used in this Surveillance, is the summation of the flows from all of the jet pumps associated with a single recirculation loop.

The mismatch is measured in terms of percent of rated core flow. If the flow mismatch exceeds the specified limits, the loop with the lower flow is considered inoperable. The SR is not required when both loops are not in operation since the mismatch limits are meaningless during single loop or natural circulation operation. The Surveillance must be performed within 24 hours after both loops are in operation. The 24 hour Frequency is consistent with the Surveillance Frequency for jet pump OPERABILITY verification and has been shown by operating experience to be adequate to detect off normal jet pump loop flows in a timely manner.

(continued)

BASES (continued)

REFERENCES

1. FSAR, Section 14.6.3.
 2. FSAR, Section 4.3.5.
 3. Deleted.
 4. Deleted.
 5. Deleted.
 6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
 7. NEDO-24236, "Browns Ferry Nuclear Plant Units 1, 2, and 3, Single-Loop Operation," May 1981.
 8. NEDC-32484P, "Browns Ferry Nuclear Plant Units 1, 2, and 3, SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," Revision 2, December 1997.
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 221 TO FACILITY OPERATING LICENSE NO. DPR-68

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT, UNIT 3

DOCKET NO. 50-296

1.0 INTRODUCTION

By letter dated July 28, 1999, the Tennessee Valley Authority (the licensee) applied for changes to the Browns Ferry Nuclear Plant, Unit 3, Technical Specifications (TS). The proposed changes would implement operability and surveillance requirements for the previously-installed Oscillation Power Range Monitor (OPRM) trip function.

The OPRM was installed as part of the Power Range Neutron Monitoring (PRNM) system upgrade during the September 1998, Cycle 8, refueling outage. TS for other portions of the PRNS system were approved by the U.S. Nuclear Regulatory Commission (NRC) in Amendment No. 213 on September 3, 1998. Amendment No. 213 provided for one cycle of plant operation with the OPRM trip function inoperable, in an "indicate only" mode, for testing purposes.

In a letter dated February 22, 1999, the licensee provided the results of operational experience and testing of the Units 2 and 3 OPRMs in the indicate-only mode. TS for Unit 2 were subsequently approved in Amendment No. 258 and the Unit 2 OPRM was enabled during the Spring 1999 start-up of that Unit.

The Units 2 and 3 OPRMs are identical and the proposed Unit 3 TS are the same as the Unit 2 TS.

2.0 EVALUATION

Because of the commonality of the Units 2 and 3 changes, applicability of the staff's March 11, 1999 Safety Evaluation for Unit 3 may be extended to Unit 2. The staff's Unit 3 safety evaluation was limited to a verification that the proposed Unit 3 TS changes are verbatim to those previously approved for Unit 2.

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.

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4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The 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 (64 FR 46450). 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.

Principal Contributor: William O. Long, NRR

Date: **September 27, 1999**

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