



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

February 19, 2003

TVA-BFN-TS-423

10 CFR 50.90

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop OWFN, P1-35  
Washington, D. C. 20555

Gentlemen:

In the Matter of	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
		50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, and 3 -  
TECHNICAL SPECIFICATIONS (TS) CHANGE 423 - ELIMINATE  
REQUIREMENTS FOR POST ACCIDENT SAMPLING SYSTEM (PASS) USING  
THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS AND DELETE  
REGULATORY COMMITMENT**

In accordance with the provisions of 10 CFR 50.4 and 10 CFR 50.90, TVA is submitting a request for an amendment to licenses DPR-33, DPR-52, and DPR-68 for BFN Units 1, 2, and 3, respectively.

The proposed amendment would delete TS 5.5.3, "Post Accident Sampling System (PASS)," and thereby eliminate the requirements to have and maintain the PASS at BFN. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System [or Station] (PASS)." The availability for this TS improvement was announced in the Federal Register on March 20, 2002, as part of the consolidated line item improvement process (CLIIP).

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U. S. Nuclear Regulatory Commission  
Page 2  
February 19, 2003

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Enclosure 2 provides the existing TS pages marked-up to show the proposed changes. Enclosure 3 provides a list of the regulatory commitments made in this submittal.

TVA requests approval of the proposed TS change for Units 1, 2, and 3 by October 1, 2003, and that the removal of the revised TS be made within 60 days of NRC approval.

TVA has determined that there are no significant hazards considerations associated with the proposed change and that the TS change qualifies for a categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and attachments to the Alabama State Department of Public Health.

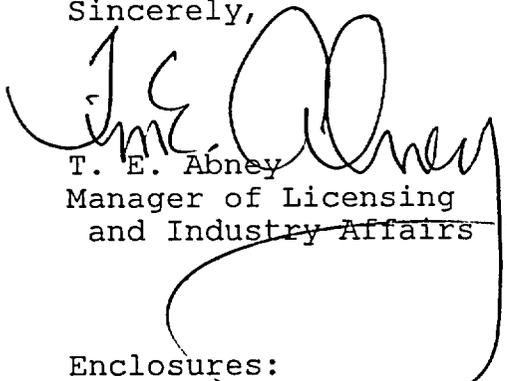
In a letter dated December 23, 1980, TVA noted a commitment to install a PASS in all three BFN Units in response to an NRC October 31, 1980 letter which addressed TMI-2 issues (i.e., NUREG 0737, item II.B.3). Unit 1 has been shutdown and defueled since 1985. At the time of its shutdown, the PASS had not been installed, and the commitment has not yet been completed. Under the guidance of NEI 99-04, Guidance for Managing NRC Commitment changes, and Regulatory Issue Summary 2000-17, Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff, TVA is also requesting deletion of this commitment. Approval of TS 423 will be considered NRC's approval of the commitment deletion.

U.S. Nuclear Regulatory Commission  
Page 3  
February 19, 2003

This letter is being sent in accordance with NRC Regulatory Issue Summary 2001-05, Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM. If you have any questions concerning this submittal, please contact me at (256) 729-2636.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 19, 2003.

Sincerely,



T. E. Abney  
Manager of Licensing  
and Industry Affairs

Enclosures:

1. Description and Assessment
2. Proposed Technical Specifications Changes (mark-up)
3. List of Regulatory Commitments

cc (Enclosures):  
State Health Officer  
Alabama State Department of Public Health  
RSA Tower - Administration  
Suite 1552  
P.O. Box 303017  
Montgomery, Alabama 36130-3017

## Enclosure 1

### Technical Specifications (TS) Change 423

#### Eliminate Requirements for Post Accident Sampling System (PASS) Using the Consolidated Line Item Improvement Process

#### Description and Assessment

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##### 1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of TS 5.5.3, "Post Accident Sampling System (PASS)."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413. The notice of availability for this technical specification improvement was announced in the Federal Register on March 20, 2002, as part of the consolidated line item improvement process (CLIIP).

In a letter dated December 23, 1980, TVA noted a commitment to install a PASS in all three BFN Units in response to an NRC October 31, 1980 letter which addressed TMI-2 issues (i.e., NUREG 0737, item II.B.3). Unit 1 has been shutdown and defueled since 1985. At the time of its shutdown, the PASS had not been installed, and the commitment has not yet been completed. Under the guidance of NEI 99-04, Guidance for Managing NRC Commitment changes, and Regulatory Issue Summary 2000-17, Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff, TVA is also requesting deletion of this commitment. Approval of TS 423 will be considered NRC's approval of the commitment deletion.

##### 2.0 ASSESSMENT

##### 2.1 Applicability of Published Safety Evaluation

TVA has reviewed the safety evaluation published on December 27, 2001, as part of the CLIIP. This

verification included a review of the NRC staff's evaluation, (as modified slightly by the notice of availability), as well as the supporting information provided to support TSTF-413 (i.e., NEDO-32991, "Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)", submitted November 30, 2000, and the associated NRC safety evaluation dated June 12, 2001). TVA has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to BFN Units 1, 2, and 3 and justify this amendment for the incorporation of the changes to the BFN Unit 1, 2, and 3 Technical Specifications.

## **2.2 Optional Changes and Variations**

TVA is not proposing any variations or deviations from the TS changes described in TSTF-413 or the NRC staff's model safety evaluation published on December 27, 2001. Additionally, BFN TS bases do not include PASS; therefore, a bases change resulting from TSTF-413 is not required.

## **3.0 REGULATORY ANALYSIS**

### **3.1 No Significant Hazards Determination**

TVA has reviewed the proposed no significant hazards consideration determination published on December 27, 2001, (66FR66949) as part of the CLIIP. TVA has concluded that the proposed determination presented in the notice is applicable to BFN, and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

### **3.2 Verification and Commitments**

As discussed in the notice published in Federal Register on December 27, 2001, for this technical specification improvement, plant-specific verifications were performed, and the results are as follows:

- A. TVA is developing contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, the suppression pool, and containment atmosphere. The contingency plans will be contained in plant implementing procedures. Implementation is complete for Units 2 and 3 and will be completed prior to fuel load of Unit 1.

Establishment and maintenance of the contingency plans are considered a regulatory commitment.

- B. The capability for classifying fuel damage events at the Alert level threshold is being established for BFN Units 1, 2, and 3 at radioactivity levels of 300 uCi/ml dose equivalent I-131. This capability will be described in emergency plan implementing procedures. Implementation is complete for Units 2 and 3 and will be completed prior to fuel load of Unit 1. The capability for classifying fuel damage events is considered a regulatory commitment.
  
- C. TVA has established the capability to monitor radioactive iodine that has been released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring radioactive iodine is maintained in emergency plan implementing procedures. Implementation is complete for Units 1, 2, and 3. The capability to monitor radioactive iodine is considered a regulatory commitment.

#### **4.0 ENVIRONMENTAL EVALUATION**

TVA has reviewed the environmental evaluation included in the model safety evaluation published on December 27, 2001, as part of the CLIIP. Based on the review, TVA has concluded that the staff's findings presented in that evaluation are applicable to BFN Units 1, 2, and 3, and the evaluation is hereby incorporated by reference for this application.

Enclosure 2

Technical Specifications (TS) Change 423

Eliminate Requirements for Post Accident Sampling  
System (PASS) Using the Consolidated Line Item  
Improvement Process

Proposed Technical Specifications Changes (mark-up)

## 5.5 Programs and Manuals (continued)

**5.5.3 Post Accident Sampling**

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and
- c. Provisions for maintenance of sampling and analysis equipment.

DELETED

**5.5.4 Radioactive Effluent Controls Program**

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402;

(continued)

## 5.5 Programs and Manuals (continued)

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(continued)

5.5 Programs and Manuals (continued)

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(continued)

Enclosure 3

Technical Specifications (TS) Change 423

Eliminate Requirements for Post Accident Sampling  
System (PASS) Using the Consolidated Line Item  
Improvement Process  
List of Regulatory Commitments

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The following table identifies those actions committed to by TVA in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Mr. T. E. Abney at (256) 729-2636.

**REGULATORY COMMITMENTS**

**DUE DATE/EVENT**

TVA is developing contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, the suppression pool, and containment atmosphere. The contingency plans will be contained in plant implementing procedures. Implementation is complete for Units 2 and 3 and will be completed prior to fuel loading of Unit 1. Establishment and maintenance of contingency plans are considered a regulatory commitment.

UNITS 2 AND 3 ARE COMPLETE, AND UNIT 1 WILL BE COMPLETED PRIOR TO FUEL LOADING OF UNIT 1.

The capability for classifying fuel damage events at the Alert level threshold is being established for BFN Units 1, 2, and 3 at radioactivity levels of 300 uCi/ml dose equivalent I-131. This capability will be described in emergency plan implementing procedures. Implementation is complete for Units 2 and 3 and will be completed prior to fuel loading of Unit 1. The capability

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COMPLETED