



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

July 2, 2004

TVA-BFN-TS-449

10 CFR 50.90

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop: OWFN P1-35  
Washington, D.C. 20555-0001

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 449 - APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO ELIMINATE REQUIREMENTS TO PROVIDE MONTHLY OPERATING REPORTS AND OCCUPATIONAL RADIATION EXPOSURE REPORTS**

Pursuant to 10 CFR 50.90, the Tennessee Valley Authority (TVA) is submitting a request for a TS change (TS-449) to licenses DPR-33, DPR-52, and DPR-68 for BFN Units 1, 2, and 3, respectively.

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC-approved Revision 1 to industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004, as part of the Consolidated Line Item Improvement Process.

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IE56

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Enclosure 1 provides a description of the proposed change and confirmation of applicability. Enclosure 2 provides the existing TS pages marked-up to show the proposed change. TVA is asking that this TS change be approved by November 1, 2004, and that the implementation 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)(10). Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and Enclosures to the Alabama State Department of Public Health.

There are regulatory commitments contained in Section 6.1 of Enclosure 1. If you have any questions about this TS change, please contact me at (256)729-2636.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2004.

Sincerely,



T. E. Abney  
Manager of Licensing  
and Industry Affairs

Enclosures:

1. Description and Assessment
2. Proposed Technical Specifications Changes (mark-up)

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Enclosures

cc: (Enclosures)

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## Enclosure 1

### Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3

#### Technical Specifications (TS) Change 449

#### Application for Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports

#### Description and Assessment

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##### 1.0 DESCRIPTION

The proposed license amendment deletes the requirements in TS 5.6.1 for an annual report on occupational radiation exposures and TS 5.6.4 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this TS improvement was announced in the Federal Register on June 23, 2004, as part of the Consolidated Line Item Improvement Process (CLIIP).

##### 2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

TS 5.6.1 Occupational Radiation Exposure Report - Deleted

TS 5.6.4 Monthly Operating Reports - Deleted

##### 3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

#### 4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

#### 5.0 TECHNICAL ANALYSIS

TVA has reviewed the safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. TVA has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to BFN 1, 2, and 3, and justify this amendment for the incorporation of the changes to the BFN TS.

#### 6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability on June 23, 2004 (69 FR 35067) and TSTF-369.

##### 6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, TVA is making the following regulatory commitments:

1. TVA is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).

The subject regulatory commitment will be maintained in the Updated Final Safety Analysis Report.

2. BFN has does not have different reactor types or both operating and shutdown reactors. Therefore, no commitment is required.

#### 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

TVA has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) 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).

#### 8.0 ENVIRONMENTAL EVALUATION

TVA has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. 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.

#### 9.0 PRECEDENT

This application is being made in accordance with the CLIIP. TVA is not proposing variations or deviations from the TS changes described in TSTF-369 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067).

#### 10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

Enclosure 2

Browns Ferry Nuclear Plant (BFN)  
Units 1, 2, and 3

Technical Specifications (TS) Change 449

Application for Technical Specification Improvement  
to Eliminate Requirements to Provide Monthly  
Operating Reports and Occupational Radiation  
Exposure Reports

Proposed Technical Specifications Changes (mark-up)

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5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1. Occupational Radiation Exposure Report

Deleted.

~~NOTE~~

~~A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.~~

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.~~

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(continued)

5.6 Reporting Requirements (continued)

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5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

Deleted.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
  - (1) The APLHGRs for Specification 3.2.1;
  - (2) The LHGR for Specification 3.2.3;
  - (3) The MCPR Operating Limits for Specification 3.2.2; and
  - (4) The RBM setpoints and applicable reactor thermal power ranges for each of the setpoints for Specification 3.3.2.1, Table 3.3.2.1-1.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (latest approved version for BFN).

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5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

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The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

Deleted.

-----NOTE-----  
A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.  
-----

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent  $> 100$  mrem and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling  $< 20$  percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

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(continued)

## 5.6 Reporting Requirements (continued)

5.6.4 Monthly Operating Reports

*Deleted.*

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5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

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Deleted.

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A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.  
-----

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrems and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD) electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

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(continued)

5.6 Reporting Requirements (continued)

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5.6.4 Monthly Operating Reports

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  - (2) The LHGR for Specification 3.2.3;
  - (3) The MCPR Operating Limits for Specification 3.2.2; and
  - (4) The RBM setpoints and applicable reactor thermal power ranges for each of the setpoints for Specification 3.3.2.1, Table 3.3.2.1-1.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
1. NEDE-24011-P-A, General Electric Standard Application for Reactor Fuel.
  2. XN-NF-81-58(P)(A), RODEX2 Fuel Rod Thermal-Mechanical Response Evaluation Model.
  3. XN-NF-85-67(P)(A), Generic Mechanical Design for Exxon Nuclear Jet Pump BWR Reload Fuel.
  4. EMF-85-74(P)(A), RODEX2A (BWR) Fuel Rod Thermal-Mechanical Evaluation Model.
  5. ANF-89-98(P)(A), Generic Mechanical Design Criteria for BWR Fuel Designs.

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