



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000
October 12, 2004
TVA-BFN-TS-432

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, D.C. 20555-0001

Gentlemen:

In the Matter of) Docket No. 50-259
Tennessee Valley Authority)

**BROWNS FERRY NUCLEAR PLANT (BFN) UNIT 1 - COMPLETION OF LICENSE
CONDITION 2.C(4)**

Pursuant to 10 CFR 50.90, Tennessee Valley Authority (TVA) is submitting a request for an amendment to license DPR-33 for BFN Unit 1. The proposed amendment describes the completion of License Condition 2.C(4) and requests its removal from the license.

The origin of License Condition 2.C(4) began on September 6, 1996 (Reference 1), when TVA submitted Units 1, 2, and 3 Technical Specifications (TS) Change 362 - Improved Technical Specifications (ITS). This change was TVA's proposed conversion package from custom TS to ITS. At the time, Units 2 and 3 were operating and Unit 1 was in long-term lay-up with no plans for return to service. Since TVA was adopting a relatively few Unit 1 TS values that were not supported by design basis documentation, TVA proposed utilizing a License Condition to ensure, in part, that the Unit 1 TS would be supported and reflected by the plant's design basis prior to returning the associated equipment to service. As part of NRC's approval of the ITS for BFN Units 1, 2 and 3 (Amendment 234 - Reference 2), NRC imposed License Condition 2.C(4), which states:

"The licensee shall review the Technical Specification (TS) changes made by License Amendment No. 234 and any subsequent TS changes, verify that the required analyses and modifications needed to support the changes are complete,

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and submit them for NRC review and approval prior to entering the mode for which the TS applies. This amendment is effective immediately and shall be implemented prior to entering the mode for which the TS applies."

The open items identified during the conversion from custom to ITS were listed on Page 12 of the accompanying Safety Evaluation. These items were associated with the confirmation of calibration frequencies, instrument check frequencies, system configurations, or setpoints.

TVA's plan for satisfying this License Condition was submitted in Reference 3. This amendment request reflects the implementation of that plan. As detailed in the enclosure, confirmation of the calibration frequencies, instrument check frequencies, system configurations, and setpoints identified by TVA in TS 362 and reflected in the NRC's Safety Evaluation have been provided as part of separate Unit 1 proposed TS requests.

Since the approval of the conversion to ITS, several Unit 1 TS have been approved or are currently under NRC review. TVA has reviewed the TS changes made since the conversion to ITS and the analyses needed to support the Unit 1 TS have been completed.

Since Unit 1 is no longer in a long-term lay-up condition, future Unit 1 TS changes will be treated just like any other operating unit. There will be no need for the License Condition in the future since the Unit 1 supporting analyses will be completed for each proposed TS change.

Therefore, TVA considers License Condition 2.C(4) to be complete and requests its removal it from the license.

With regards to the overall subject of configuration control, TVA will have reasonable assurance that the as-built facility will be reflected by the plant's design basis and TS at the time of Unit 1 restart. This assurance is provided, in part, by:

- Controlling fidelity between the Unit 1 TS and the plant design basis during the BFN shutdown period;
- Implementing the Design Baseline Verification Program, which will validate key plant specific values and setpoints that are reflected in the TS;

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- Utilizing TVA's configuration management, 10 CFR 50.59 and UFSAR programs during the development and implementation of the modifications necessary to restart Unit 1, to ensure the affected areas are accurately reflected in the TS; and
- TVA's review of previous TS amendments to identify required Unit 1 changes.

The proposed amendment is necessary to support the restart of Unit 1. TVA requests the amendment be approved by November 1, 2005.

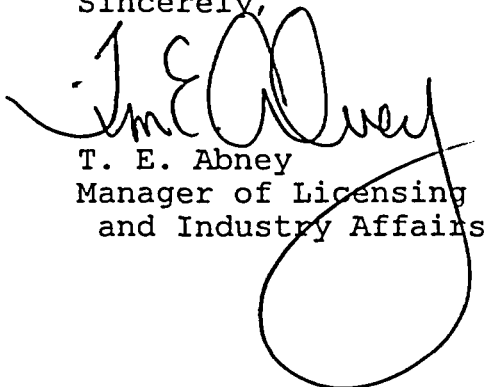
TVA has determined there are no significant hazards considerations associated with the proposed amendment and the change qualifies for a categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending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

Enclosure 1 provides TVA's evaluation of the proposed amendment. Enclosure 2 provides a mark-up of the proposed license change.

There are no regulatory commitments associated with this submittal. If you have any questions about this amendment, please contact me at (256)729-2636.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 12, 2004.

Sincerely,



T. E. Abney
Manager of Licensing
and Industry Affairs

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- References:
1. TVA letter, T.E. Abney to NRC, dated September 6, 1996, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2 and 3 - Technical Specification (TS) Change TS-362 - Request to Convert Current TSs to Improved Standard TS (ISTS) Consistent with NUREG-1433, Revision 1."
 2. NRC letter, L. Raghavah to J.A. Scalice, dated July 14, 1998, "Amendment Nos. 234, 253 and 212 to Facility Operating License Nos. DPR-33, DPR-52 and DPR-68: Regarding Conversion to Improved Standard Technical Specifications for the Browns Ferry Nuclear Plant, Units 1, 2 and 3 (TAC Nos. M96431, M96432 and M96433)."
 3. TVA letter, T.E. Abney to NRC, dated June 16, 2004, "Browns Ferry Nuclear Plant (BFN) - Unit 1 - Plan For Satisfying License Condition 2.C(4)."

Enclosures:

1. TVA Evaluation of Proposed Amendment
2. Proposed Operating License Amendment (mark-up)

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Enclosures

cc: (Enclosures)

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Enclosure 1

Ferry Nuclear Plant (BFN) Unit 1 Completion of License Condition 2.C(4)

TVA Evaluation of Proposed Amendment

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1.0 DESCRIPTION

This letter requests an amendment to Operating License DPR-33 for BFN Unit 1. The proposed amendment describes the completion of License Condition 2.C(4) and requests its removal from the license.

The proposed amendment is necessary to support the restart of Unit 1. TVA requests the amendment be approved by November 1, 2005.

2.0 PROPOSED AMENDMENT

BFN Unit 1 License Condition 2.C(4) states:

"The licensee shall review the Technical Specification (TS) changes made by License Amendment No. 234 and any subsequent TS changes, verify that the required analyses and modifications needed to support the changes are complete, and submit them for NRC review and approval prior to entering the mode for which the TS applies. This amendment is effective immediately and shall be implemented prior to entering the mode for which the TS applies."

The proposed amendment describes the completion of License Condition 2.C(4) and requests its removal from the license.

A mark-up of the License showing the proposed amendment is provided in Enclosure 2.

3.0 BACKGROUND

All three BFN units were voluntarily shutdown by TVA in March 1985. Unit 2 restarted in May 1991 and Unit 3 in November 1995. Several modifications and the resulting changes to the Units 2 and 3 Technical Specifications (TS) were made during the recovery efforts. Unit 1 has been maintained in a long-term lay-up state.

On September 6, 1996 (Reference 1), TVA submitted Units 1, 2, and 3 TS Change 362 - Improved Technical Specifications, which was TVA's conversion package from custom TS to Improved Technical Specifications (ITS). The Units 1, 2 and 3 ITS were based on NUREG-1433, *Standard Technical Specification for BWR/4 Plants*, Revision 1. At the time, Units 2 and 3 were operating and Unit 1 was in long-term lay-up with no plans for return to service.

During the conversion process, a relatively few Unit 1 specific setpoints or configurations adopted the ITS values used for Units 2 and 3. TVA's application identified these items for Unit 1 that must be validated prior to restart or necessary changes made. Since these Unit 1 TS confirmatory items were not supported by design basis documentation, NRC requested (Reference 2) TVA to provide a description of the controls, including license requirements, which would ensure that BFN Unit 1 could not be put into an operating configuration before all required activities were completed.

On December 29, 1997 (Reference 3), in response to the NRC letter, TVA stated that it planned to perform the required analyses and modifications on Unit 1 such that on restart, the Unit 1 plant configuration and analysis basis will be the same or similar to Units 2 and 3. Hence, in TS-362, the proposed Unit 1 ITS were the same as those proposed for Units 2 and 3 except for minor intrinsic unit differences. TVA proposed a License Condition be added to the Unit 1 license. This would ensure that the appropriate modifications and analyses were in place prior to entering modes of operation for which the TS apply. The purpose of the License Condition was to:

- Ensure the changes to the Unit 1 TS, identified in the application for conversion to ITS as lacking the required analysis, were supported and reflected by the plant's design basis prior to returning the associated equipment to service; and
- Allow future TS changes to be made to all three units, during the period that Unit 1 was in a long-term lay-up condition, without requiring Unit 1 supporting analyses be performed prior to submittal or requiring additional license conditions be added for each amendment.

NRC approved TVA's proposed conversion to ITS for BFN Units 1, 2 and 3. As part of the License Amendment (Reference 4), NRC imposed License Condition 2.C(4). Page 12 of the Safety Evaluation states:

"Unit 1 Restart Issues:

The Unit 1 license will contain a restart license condition to require staff acceptance of Unit 1 channel calibration and channel check frequency changes for CTS Tables 3.2.A, 3.2.B, 4.1.B, 4.2.A, 4.2.B made to be consistent with Units 2 and 3. These changes to frequencies have been reflected in the proposed BFN ITS for Unit 1 as the same as those in the proposed ITS for Units 2 and 3. The Unit 1 Calibration frequencies for these functions will be

validated prior to Unit 1 recovery and changes to the proposed BFN ITS for Unit 1 will be made as necessary. [The DOCS that are affected for this example are 3.3.1.1, A11; 3.3.5.1, A3; 3.3.5.2, A8; 3.3.6.1, A12, A13, A14, A15 (partial); 3.3.6.2 A10; and 3.3.7.1, A5.] Staff acceptance of these calibrations and frequencies are shown here as an example of the kinds of reviews that will be required before Unit 1 restarts. Additional issues that will require staff acceptance before Unit 1 restarts exist in other sections of the ITS."

3.1 Closure of the Specific Improved Technical Specification Conversion Open Items

TVA's application for conversion to ITS identified the changes for Unit 1 that must be validated prior to Unit 1 recovery or necessary changes made. These changes were listed on Page 12 of the NRC's Safety Evaluation. Each of these changes, the method for validation, and reference to the confirmatory submittal to NRC are provided below.

- Justification for Change A11 in Section 3.3.1.1:
Calibration frequencies for High Reactor Pressure, High Drywell Pressure and Reactor Low Water Level.

There are three instrument calibration frequencies within the scope of this change:

- The High Reactor Pressure instrument calibration frequency of 184 days for TS Table 3.3.1.1-1, Function 3, has been confirmed by design calculations for all three units. A statement validating the current Unit 1 TS value was included on Page E1-59 of TS 433, Unit 1 24 Month Fuel Cycle (Reference 5).
- Validation of the High Drywell Pressure instrument calibration frequency of 18 months for TS Table 3.3.1.1-1, Function 6 is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5, Page E1-23 and TS Pages 3.3-5 and 3.3-7).
- Validation of the Reactor Low Water Level instrument calibration frequency of 18 months for TS Table 3.3.1.1-1, Function 4 is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5, Page E1-22 and TS Pages 3.3-5 and 3.3-7).

- Justification for Change A3 in Section 3.3.5.1:
Calibration frequencies for Reactor Low Water Level, Drywell High Pressure, Reactor Low Pressure, and Reactor High Water Level.

There are four sets of instrument calibration frequencies within the scope of this change:

- Validation of the Reactor Low Water Level instrument calibration frequency of 18 months for TS Table 3.3.5.1-1, Functions 1a, 2a, 2e, 3a, 4a, 4d, and 5a is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5). These proposed changes were shown on TS Pages 3.3-41 through 3.3-46 and discussed in the submittal as follows:

<u>FUNCTION</u>	<u>PAGE NUMBER</u>
1a	E1-36
2a	E1-38
2e	E1-39
3a	E1-41
4a	E1-42
4d	E1-43
5a	E1-44

- Validation of the Drywell High Pressure instrument calibration frequency of 18 months for TS Table 3.3.5.1-1, Functions 1b, 2b, 3b, 4b, and 5b is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5). These proposed changes were shown on TS Pages 3.3-41 through 3.3-46 and discussed in the submittal as follows:

<u>FUNCTION</u>	<u>PAGE NUMBER</u>
1b	E1-36
2b	E1-39
3b	E1-41
4b	E1-42
5b	E1-44

- The Reactor Low Pressure instrument calibration frequency of 184 days for TS Table 3.3.5.1-1, Functions 1c, 2c and 2d, has been confirmed by design calculations for all three units. A statement validating the current Unit 1 TS value was included on Page E1-59 of TS 433, Unit 1 24 Month Fuel Cycle (Reference 5).
- Validation of the Reactor High Water Level instrument calibration frequency of 18 months for TS Table 3.3.5.1-1, Function 3c is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5, Page E1-41 and TS Pages 3.3-41 and 3.3-45).
- Justification for Change A8 in Section 3.3.5.2: Calibration frequencies for Reactor Low Water Level and Reactor High Water Level.

There are two instrument calibration frequencies within the scope of this change:

- Validation of the Reactor Low Water Level instrument calibration frequency of 18 months for TS Table 3.3.5.2-1, Function 1 is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5, Page E1-46 and TS Pages 3.3-50 and 3.3-51).

Validation of the Reactor High Water Level instrument calibration frequency of 18 months for TS Table 3.3.5.2-1, Function 2 is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5, Page E1-46 and TS Pages 3.3-50 and 3.3-51).

- Justification for Changes in Section 3.3.6.1:
 - Change A12 - The Reactor Water Cleanup (RWCU) temperature functions (Cleanup System Floor Drain and Space High Temperatures).

A statement, asserting that the design change to make the Unit 1 RWCU steam line break temperature monitoring functions consistent with their Units 2 and 3 counterparts has been issued and will be implemented prior to entering the modes for which their respective TS apply, was included as part of proposed TS 433, Unit 1 24 Month Fuel Cycle (Reference 5, Page E1-62).

Validation or proposed changes to the allowable values for the RWCU temperature functions for TS Table 3.3.6.1-1, Functions 5a-f, was included as part of TS 447, Extension of Channel Calibration Surveillance Requirement Performance Frequency and Allowable Value Revision for Units 1, 2 and 3 (Reference 6, Pages E-1 and E-6 and TS Page 3.3-60).

- Change A13 - The Reactor Low Water Level, High Drywell Pressure, RWCU temperature function, and RCIC and HPCI Turbine Steam Line High Flow calibration frequencies.

There are five instrument calibration frequencies within the scope of this change:

- o Validation of the Reactor Low Water Level instrument calibration frequency of 18 months for TS Table 3.3.6.1-1, Functions 1a, 2a, 5h and 6b is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5). These proposed changes were shown on TS Pages 3.3-57, 3.3-58 and 3.3-60 and discussed in the submittal as follows:

<u>FUNCTION</u>	<u>PAGE NUMBER</u>
1a	E1-47
2a	E1-49
5h	E1-52
6b	E1-53

- o Validation of the Drywell High Pressure instrument calibration frequency of 18 months for TS Table 3.3.6.1-1, Functions 2b, and 6c is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5). These proposed changes were shown on TS Pages 3.3-57, 3.3-58 and 3.3-60 and discussed in the submittal as follows:

<u>FUNCTION</u>	<u>PAGE NUMBER</u>
2b	E1-49
6c	E1-53

- o Validation the RWCU High Temperature System Isolation instrument calibration frequency of 122 days for TS Table 3.3.6.1-1, Functions 5a-f, is no longer required. TVA proposed a 24 month calibration frequency as part of TS 447 (Reference 6, Pages E-1 and E-5 and TS Page 3.3-60).
- o Validation of the RCIC Turbine Steam Line High Flow instrument calibration frequency of 18 months for TS Table 3.3.6.1-1, Function 4a is no longer required. TVA proposed a 24 month calibration frequency as part of TS 433 (Reference 5, Page E1-50 and TS Pages 3.3-57 and 3.3-59).
- o Validation of the HPCI Turbine Steam Line High Flow instrument calibration frequency of 18 months for TS Table 3.3.6.1-1, Function 3a is no longer required. TVA proposed a 24 month calibration frequency as part of proposed TS 433 (Reference 5, Page E1-49 and TS Pages 3.3-57 and 3.3-58).
- Change A14 - The Instrument Checks for RCIC and HPCI Steam Supply Low Pressure and Turbine Exhaust Diaphragm High Pressure.

There are four instrument calibration checks within the scope of this change:

- o The justification for asserting that no RCIC Steam Supply Low Pressure instrument check frequency is required for TS Table 3.3.6.1-1, Function 4b, was included as part of proposed TS 433 (Reference 5, Page E1-61).
 - o The justification for asserting that no RCIC Turbine Exhaust Diaphragm High Pressure instrument check frequency is required for TS Table 3.3.6.1-1, Function 4c, was included as part of proposed TS 433 (Reference 5, Page E1-61).
 - o The justification for asserting that no HPCI Steam Supply Low Pressure instrument check frequency is required for TS Table 3.3.6.1-1, Function 3b, was included as part of proposed TS 433 (Reference 5, Page E1-60).
 - o The justification for asserting that no HPCI Turbine Exhaust Diaphragm High Pressure instrument check frequency is required for TS Table 3.3.6.1-1, Function 3c, was included as part of proposed TS 433 (Reference 5, Page E1-61).
- Change A15 - The RCIC and HPCI Torus and Pump Room High Temperature trip functions.

A statement, asserting that the design changes to make the Unit 1 RCIC and HPCI steam line break temperature monitoring functions consistent with their Units 2 and 3 counterparts have been issued and will be implemented prior to entering the modes for which their respective TS apply, has been included as part of proposed TS 433 (Reference 5, Page E1-62). Validation or proposed changes to the allowable values for the RCIC and HPCI Torus and pump room temperature functions for TS Table 3.3.6.1-1, Functions 3d-g and 4d-g, was included as part of proposed TS 447 (Reference 6, Pages E-1 and E-5 and TS Page 3.3-59).

- Justification for Change A10 in Section 3.3.6.2:
Calibration frequencies for Reactor Low Water Level and High Drywell Pressure.

There are two instrument calibration frequencies within the scope of this change:

- Validation of the Reactor Low Water Level instrument calibration frequency of 18 months for TS Table 3.3.6.2-1, Function 1 is no longer required. TVA proposed a 24 month calibration frequency as part of proposed TS 433 (Reference 5, Page E1-54 and TS Pages 3.3-63 and 3.3-64).
 - Validation of the High Drywell Pressure instrument calibration frequency of 18 months for TS Table 3.3.6.2-1, Function 2 is no longer required. TVA proposed a 24 month calibration frequency as part of proposed TS 433 (Reference 5, Page E1-54 and TS Pages 3.3-63 and 3.3-64).
- Justification for Change A5 in Section 3.3.7.1:
Calibration frequencies for High Drywell Pressure.

Validation of the High Drywell Pressure instrument calibration frequency of 18 months for TS Table 3.3.7.1-1, Function 2 is no longer required. TVA proposed a 24 month calibration frequency as part of proposed TS 433 (Reference 5, Page E1-54 and TS Pages 3.3-68 and 3.3-69).

3.2 Closure of Confirmatory Items associated with Technical Specifications Approved or Proposed since the Conversion to Improved Technical Specifications

Since the approval of the conversion to ITS in Amendment 234, several TS have been approved for Unit 1 or are currently under NRC review. These amendments and proposed TS changes have been reviewed to identify any outstanding Unit 1 supporting analyses which would have to be submitted to NRC. For TS 405 - Alternate Source Term, TVA committed to submit the Unit 1 analyses for a Loss of Coolant, Control Rod Drop and Main Steam Line Break accidents. These analyses were provided to NRC as part of a separate submittal (Reference 7). No other Unit 1 supporting analyses need to be submitted to NRC.

3.3 Future Technical Specification Changes

Since Unit 1 is no longer in a long-term lay-up condition, future Unit 1 TS changes will be treated just like any other operating unit. There will be no need for the License Condition in the future since the Unit 1 supporting analyses will be included for each proposed Technical Specification change.

4.0 TECHNICAL ANALYSIS

There are no proposed changes to the TS, plant design, change the conditions, operating configurations, or minimum amount of operating equipment associated with this proposed License Amendment.

The open items identified during the conversion from custom to ITS were associated with the confirmation of calibration frequencies, instrument check frequencies, system configurations, or setpoints. The confirmation of these items or necessary revisions has been provided by other proposed TS changes (References 5 and 6).

5.0 REGULATORY SAFETY ANALYSIS

The Tennessee Valley Authority (TVA) is submitting an amendment request to license DPR-33 for the Browns Ferry Nuclear Plant Unit 1. The proposed amendment describes the completion of License Condition 2.C(4). BFN Unit 1 License Condition 2.C(4) states:

"The licensee shall review the Technical Specification (TS) changes made by License Amendment No. 234 and any subsequent TS changes, verify that the required analyses and modifications needed to support the changes are complete, and submit them for NRC review and approval prior to entering the mode for which the TS applies. This amendment is effective immediately and shall be implemented prior to entering the mode for which the TS applies."

Confirmation of the required calibration frequencies, instrument check frequencies, system configurations, and setpoints has been provided as part of separate Unit 1 proposed Technical Specification (TS) change requests. Therefore, TVA requests removal of License Condition 2.C(4) from the license.

5.1 No Significant Hazards Consideration

TVA has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment", as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed amendment does not affect any precursors for accidents described in Chapter 14 of the Browns Ferry Updated Final Safety Analysis Report (UFSAR). The proposed amendment does not change the conditions, operating configurations, or minimum amount of operating equipment assumed in the safety analysis for accident mitigation. No changes are proposed in plant protection or which create new modes of plant operation. Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed amendment does not introduce new equipment, which could create a new or different kind of accident.

No new external threats, release pathways, or equipment failure modes are created. Therefore, the implementation of the proposed amendment will not create a possibility for an accident of a new or different type than those previously evaluated.

- 3.0 Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed amendment does not impact the redundancy or availability of equipment credited in the response to accidents described in Chapter 14 of the UFSAR. For these reasons, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, TVA concludes that the proposed amendment present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

As described herein, TVA will have reasonable assurance that the TS will reflect the analyses and evaluations included in the UFSAR at the time of Unit 1 restart. Hence, the requirements of 10 CFR 50.36, *Technical Specifications*, will be satisfied.

In conclusion, based on the considerations discussed above, (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 the health and safety of the public.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(9). Therefore, pursuant to 10 CFR 50.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

1. TVA letter, T.E. Abney to NRC, dated September 6, 1996, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2 and 3 - Technical Specification (TS) Change TS-362 - Request to Convert Current TSS to Improved Standard TS (ISTS) Consistent with NUREG-1433, Revision 1."
2. NRC letter, J.F. Williams to O.D. Kingsley, dated July 14, 1997, "Browns Ferry Nuclear Plant Unit 1 - Improved Standard Technical Specifications (TAC No. M96431)."
3. TVA letter, T.E. Abney to NRC, dated December 29, 1997, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 Technical Specifications (TS) Change - 362 - Improved Technical Specifications (ITS) Supplement 13 - Response to Request for Additional Information (RAI) - ITS Section 3.6 (TAC Nos. M96431, M96432, and M96433) and Proposed ITS License Condition - BFN Unit 1 (TAC No. M96431)."
4. NRC letter, L. Raghavan to J.A. Scalice, dated July 14, 1998, "Amendment Nos. 234, 253 and 212 to Facility Operating License Nos. DPR-33, DPR-52 and DPR-68: Regarding Conversion to Improved Standard Technical Specifications for the Browns Ferry Nuclear Plant, Units 1, 2 and 3 (TAC Nos. M96431, M96432 and M96433)."
5. TVA letter, T. Abney to NRC, dated August 16, 2002, "Browns Ferry Nuclear Plant (BFN) Unit 1 - Technical Specification Change (TS) 433 - 24 Month Fuel Cycle."
6. TVA letter, T. Abney to NRC, dated August 16, 2002, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Technical Specifications (TS) Change TS-447 - Extension of Channel Calibration Surveillance Requirement Performance Frequency and Allowable Value Revision".
7. TVA letter, T.E. Abney to NRC, dated May 17, 2004, "Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Response to Request for Additional Information (RAI) and Unit 1 Analysis Results Related to Technical Specifications (TS) Change No. TS-405 - Alternative Source Term (AST) (TAC Nos. MB5733, MB 5734, MB5735)".

Enclosure 2

Ferry Nuclear Plant (BFN) Unit 1
Completion of License Condition 2.C(4)

Proposed Operating License Amendment (mark-up)

- (4) ~~The licensee shall review the Technical Specification (TS) changes made by License Amendment No. 234 and any subsequent TS changes, verify that the required analyses and modifications needed to support the changes are complete, and submit them for NRC review and approval prior to entering the mode for which the TS applies. This amendment is effective immediately and shall be implemented prior to entering the mode for which the TS applies~~
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