

Agenda



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- ❖ Purpose
 - ❖ Background
 - ❖ Proposed Resolution
 - ❖ Open Discussion/Conclusion

Introduction



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- ❖ **Significant Issue**
 - Potential cost to TVA in millions
 - Potential delay to Unit 1 restart

 - ❖ **Resolution Needed Expeditiously to Prevent Further Delays**

Background



- ❖ NEI Letter to NRC Dated December 5, 2003
 - White paper addressing technical basis of Method 3 and Standard Technical Specification (STS) structure
 - Requested NRC not hold-up review of in-process license amendments
- ❖ NRC Letter to NEI Dated February 20, 2004
 - Setpoint issue does not raise significant generic concerns that would prevent issuance of amendments
 - Longer term actions to resolve generic issue to be addressed with NEI, ISA, and other interested stakeholders
- ❖ NRC Letter to NEI Dated June 17, 2004
 - Reviews of license amendments continuing
 - Concerns identified by NRC for further consideration on generic issue
- ❖ NEI Letter to NRC Dated December 17, 2004
 - Provided independent review of Method 3
 - Concluded Method 3 is acceptable method to establish setpoints and allowable values (AVs)
 - Requested meeting with NRC management to discuss conclusions
- ❖ BFN Status
 - Method 3 Plant
 - ITS based on Rev 1 NUREG-1433 BWR/4 STS (Modern Format STS)
 - SR Procedures require trip setpoints be adjusted to within established calibration tolerance band

Background (cont'd)



❖ NRC Letter to TVA Dated January 6, 2005

- Put hold on six BFN TS changes based on TVA use of Method 3
- NRC not able to accept TS changes that are based upon the use of Method 3, unless the method is modified to alleviate the staff's technical concerns
 - Each setpoint limit in the TS must ensure at least 95% probability with at least 95% confidence that the associated action will be initiated with the process variable no less conservative than the initiation value assumed in the plant safety analyses
 - Operability of each instrument channel addressed in the setpoint-related TS must be ensured by the TS
 - Reliance on settings or practices outside the TS and not mandated by them is inadequate
 - Indicated alternative approach (Performance-Based TS) similar to recent Ginna TS acceptable. Performance-Based TS sets limits on acceptable nominal setpoints and the observed deviation in the measured setpoint from the end of one test to the beginning of the next.

Background



❖ BFN TS on Hold

- TS-437 – Lower SDV Float Switch Level AVs (Unit 1)
- TS-434 – Lower Reactor Vessel Water Level – Low Level 3 AV (Unit 1)
- TS-418 – Extended Power Uprate (Units 2 and 3)
- TS-431 – Extended Power Uprate (Unit 1)
- TS-433 – 24-Month Operating Cycle (Unit 1)
- TS-447 – Extend HPCI/RCIC/RWCU Area Temperature Surveillance Calibration Frequencies (Units 1, 2, and 3)

Proposed Resolution



❖ Interim Solution Needed for BFN TS Changes

➤ Objectives of Interim Solution

- Maintain assurance of compliance with TS
- Maintain consistency for all AVs
- Maintain consistency of BFN Units 1, 2, and 3 TS
- Provide assurance that current practice cannot be changed without NRC approval
- Minimize rework required to implement generic resolution

➤ Proposed Bases Change to Applicable SR Bases

- Readjustment provision is basically a procedural requirement
- Typical of type of provisions that go into TS Bases
- STS NUREGs Rev.3, March 2004, includes provisions on readjustments
- TS Bases changes are subject to 50.59 review in accordance with TS 5.5.10
- Draft change developed to make it definitive that setpoint methodology depends on readjustment
- Bases changes can be implemented locally – reduces licensee expense
- If NRC needs additional assurances, recommend referencing Bases change in TS SER
- TS changes should be initiated generically through industry STS Committees
 - Consensus approach via TSTF
 - Consistency of usage via STS and NEI 01-03
 - Cost sharing
 - Could apply change to all affected TS

Proposed Resolution (cont'd)



❖ Proposed Bases Change Meets all Objectives and Requirements

- Use of AVs to satisfy 10 CFR 50.36 requirements is a well-established position as endorsed in the STS NUREGs
- Procedural details for meeting TS Requirements are included in UFSAR, TS Bases, Programs, or plant procedures
- Common practice throughout STS to provide detail regarding Operability requirements in the TS Bases
- BFN Interim Solution explicitly defines basis for TS AV and relationship to Method 3
- Applies to all TS AVs (not only ones being changed by current TS change)
- Can be implemented in all 3 units' TS to maintain consistency and eliminate confusion
- Provides assurance that cannot be changed without NRC approval
 - TS 5.5.10, TS Bases Control Program requires 50.59 evaluation for Bases changes
 - 50.59(c)(2)(viii) states "change in methodology" requires license amendment
- Proposed Bases change can be done expeditiously
- Can be easily revised (if needed) when generic resolution defined

Closing Remarks

