Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

October 20, 2009

10 CFR 50.90

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

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Sequoyah Nuclear Plant, Units 1 and 2
Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Unit 1
Facility Operating License No. NPF-90
NRC Docket No. 50-390

Subject: **License Amendment Request for Adoption of TSTF-511, Revision 0, "Eliminate Working Hour Restrictions From TS 5.2.2 To Support Compliance With 10 CFR Part 26" - Browns Ferry Nuclear Plant Technical Specification Change 469; Sequoyah Nuclear Plant Technical Specification Change 09-04; and Watts Bar Nuclear Plant Technical Specification Change 09-19**

Reference: Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-511, Revision 0 "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26."

In accordance with the provisions of 10 CFR 50.90 of Title 10 of the Code of Federal Regulations (CFR), Tennessee Valley Authority (TVA) is submitting a request for amendments to the Technical Specifications (TS) for Browns Ferry Nuclear Plant, Units 1, 2, and 3; Sequoyah Nuclear Plant, Units 1 and 2; and Watts Bar Nuclear Plant, Unit 1.

The proposed amendments would delete those portions of the TS superseded by 10 CFR Part 26, Subpart I. This change is consistent with NRC approved Revision 0 to TSTF Improved Standard Technical Specification Change Traveler, TSTF-511,

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NRR

"Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26," except that for Sequoyah Nuclear Plant, Units 1 and 2, the section being deleted is 6.2.2.g. The availability of this TS improvement was announced in the Federal Register on December 30, 2008 (73 FR 79923), as part of the Consolidated Line Item Improvement Process (CLIIP).

Enclosure 1 provides an evaluation of the proposed change. Enclosure 2 provides the existing TS pages marked up to show the proposed change for Browns Ferry Nuclear Plant, Units 1, 2, and 3. Enclosure 3 provides the existing TS pages marked up to show the proposed change for Sequoyah Nuclear Plant, Units 1 and 2. Enclosure 4 provides the existing TS page marked up to show the proposed change for Watts Bar Nuclear Plant, Unit 1. Enclosure 5 provides the proposed TS change in final typed format for Browns Ferry Nuclear Plant, Units 1, 2, and 3. Enclosure 6 provides the proposed TS change in final typed format for Sequoyah Nuclear Plant, Units 1 and 2. Enclosure 7 provides the proposed TS change in final typed format for Watts Bar Nuclear Plant, Unit 1.

TVA implemented 10 CFR Part 26 requirements for working hour restrictions on October 1, 2009. The 10 CFR Part 26 requirements are more restrictive than the current TS requirements. TVA will implement the proposed TS changes within 30 days after approval is received.

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 enclosures to the Alabama State Department of Public Health and the Tennessee State Department of Public Health.

There are no regulatory commitments included in this submittal.

Please direct any questions concerning this matter to Dan Green at (423) 751-8423.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on the 20th day of October, 2009.

Respectfully,

R. M. Krich
Vice President
Nuclear Licensing

Enclosures: Enclosure 1 - Evaluation of Proposed Change
Enclosure 2 - Browns Ferry Nuclear Plant, Units 1, 2, and 3 Proposed Technical Specifications Changes (Mark-Up)
Enclosure 3 - Sequoyah Nuclear Plant, Units 1 and 2 Proposed Technical Specifications Changes (Mark-Up)
Enclosure 4 - Watts Bar Nuclear Plant, Unit 1 Proposed Technical Specifications Changes (Mark-Up)
Enclosure 5 - Browns Ferry Nuclear Plant, Units 1, 2, and 3 Proposed Technical Specifications Changes (Re-Typed)
Enclosure 6 - Sequoyah Nuclear Plant, Units 1 and 2 Proposed Technical Specifications Changes (Re-Typed)
Enclosure 7 - Watts Bar Nuclear Plant, Unit 1 Proposed Technical Specifications Changes (Re-Typed)

bcc (Enclosures):

NRC Regional Administrator - Region II

NRC Senior Resident Inspector - Browns Ferry Nuclear Plant

NRC Senior Resident Inspector - Sequoyah Nuclear Plant

NRC Senior Resident Inspector - Watts Bar Nuclear Plant

State Health Officer, Alabama State Department of Public Health

Director, Division of Radiological Health - State of Tennessee

ENCLOSURE 1

EVALUATION OF PROPOSED CHANGE

License Amendment Request to Adopt TSTF-511, Revision 0, "Eliminate Working Hour Restrictions From TS 5.2.2 To Support Compliance With 10 CFR Part 26"
Browns Ferry Nuclear Plant, Units 1, 2, and 3 Technical Specifications (TS) Change 469
Sequoyah Nuclear Plant, Units 1 and 2 TS Change 09-04
Watts Bar Nuclear Plant, Unit 1 TS Change 2009-19

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1.0 DESCRIPTION

The proposed amendment would delete those portions of the TS superseded by 10 CFR Part 26, Subpart I. This change is consistent with Nuclear Regulatory Commission (NRC) approved Revision 0 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-511, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26." Minor differences between the proposed plant specific TS changes and the changes proposed by TSTF-511 are listed in Section 2.0. The availability of this TS improvement was announced in the *Federal Register* on December 30, 2008 (73 FR 79923), as part of the consolidated line improvement process (CLIIP).

2.0 PROPOSED CHANGE

Consistent with the NRC approved Revision 0 of TSTF-511, the proposed TS changes delete those portions of TS superseded by 10 CFR Part 26, Subpart I for Browns Ferry Nuclear Plant, Units 1, 2 and 3; Sequoyah Nuclear Plant, Units 1 and 2; and Watts Bar Nuclear Plant, Unit 1. This application is being made in accordance with the CLIIP.

The proposed changes are consistent with Revision 0 of TSTF-511 except that an administrative difference exists for Sequoyah Nuclear Plant, Units 1 and 2. TS 6.2.2 paragraph g is deleted instead of TS 5.2.2 paragraph d. This change will have no impact on the NRC staff's model safety evaluation (SE) published on December 30, 2008 (73 FR 79923).

TVA implemented 10 CFR Part 26 requirements for work hour restrictions on October 1, 2009. The 10 CFR Part 26 requirements are more restrictive than the current TS requirements and as such does not require a commitment. TVA will implement the proposed TS changes within 30 days after approval is received. This does represent a deviation from the consolidated line item improvement process (CLIIP). However, this will have no impact on the NRC staff's model safety evaluation (SE) published on December 30, 2008 (73 FR 79923).

3.0 BACKGROUND

The NRC issued a *Federal Register* Notice (73 FR 16966, March 31, 2008) of the issuance of a final rule that amended 10 CFR Part 26. The revised regulations in 10 CFR Part 26, Subpart I supersede working hour restrictions contained in paragraph d of TS 5.2.2 for Browns Ferry Nuclear Plant, Units 1, 2 and 3, and Watts Bar Nuclear Plant, Unit 1, and in paragraph g of TS 6.2.2 for Sequoyah Nuclear Plant, Units 1 and 2. The background for this application is adequately addressed by the NRC Notice of Availability published on December 30, 2008 (73 FR 79923).

4.0 TECHNICAL ANALYSIS

Tennessee Valley Authority (TVA) has reviewed the SE published on December 30, 2008 (73 FR 79923), as part of the CLIIP Notice of Availability. TVA has concluded that the technical justifications presented in the SE prepared by the NRC Staff are applicable to Browns Ferry Nuclear Plant, Units 1, 2 and 3; Sequoyah Nuclear Plant, Units 1 and 2; and Watts Bar Nuclear Plant, Unit 1.

10 CFR Part 26, Subpart I, supersedes existing worker fatigue guidance. 10 CFR Part 26, Subpart I, distinguishes between work hour controls and fatigue management and strengthens the requirements for both. Under the new rule, work hour restrictions include not only work hour limitations for rolling 24-hour, 48-hour, and 7-day periods, but also include a required minimum break between work periods and varying required minimum days off. Additionally, Subpart I confines the use of waivers (deviations from restrictions) to situations where overtime is necessary to mitigate or prevent a condition adverse to safety or necessary to maintain the security of the facility. Subpart I also strengthens reporting requirements. Finally, the new rule's work hour control scope includes certain operating and maintenance personnel, as well as individuals directing those operating and maintenance personnel, health physics and chemistry personnel who are a part of the on-site emergency response organization minimum shift compliment, the fire brigade member who is responsible for understanding the effects of fire and fire suppressants on safe shutdown capability, and certain security personnel.

The proposed change removes working hour limits imposed in the TS in order to support compliance with 10 CFR Part 26, Subpart I. Work hour controls and fatigue management requirements have been incorporated into the NRC regulations; therefore, it is unnecessary to have work hour control requirements in the TS.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Determination

TVA has reviewed the no significant hazards determination published on December 30, 2008 (73 FR 79923) as part of the CLIIP Notice of Availability. TVA has concluded that the determination presented in the notice is applicable to Browns Ferry Nuclear Plant, Units 1, 2 and 3; Sequoyah Nuclear Plant, Units 1 and 2; and Watts Bar Nuclear Plant, Unit 1. TVA has evaluated the proposed changes to the TS using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

1. The Proposed Change Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated

The proposed change removes Technical Specification (TS) restrictions on working hours for personnel who perform safety related functions. The TS restrictions are superseded by the worker fatigue requirements in 10 CFR Part 26. The proposed change does not impact the physical configuration or function of plant structures, systems, or components (SSCs) or the manner in which SSCs are operated, maintained, modified, tested, or inspected. Worker fatigue is not an initiator of any accident previously evaluated. Worker fatigue is not an assumption in the consequence mitigation of any accident previously evaluated.

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **The Proposed Change Does Not Create the Possibility of a New or Different Kind of Accident From Any Accident Previously Evaluated**

The proposed change removes TS restrictions on working hours for personnel who perform safety related functions. The TS restrictions are superseded by the worker fatigue requirements in 10 CFR Part 26. Working hours will continue to be controlled in accordance with NRC requirements. The new rule allows for deviations from controls to mitigate or prevent a condition adverse to safety or as necessary to maintain the security of the facility. This ensures that the new rule will not unnecessarily restrict working hours and thereby create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not alter the plant configuration, require new plant equipment to be installed, alter accident analysis assumptions, add any initiators, or effect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. **The Proposed Change Does Not Involve a Significant Reduction in a Margin of Safety**

The proposed change removes TS restrictions on working hours for personnel who perform safety related functions. The TS restrictions are superseded by the worker fatigue requirements in 10 CFR Part 26. The proposed change does not involve any physical changes to the plant and does not alter the manner in which plant systems are operated, maintained, modified, tested, or inspected. The proposed change does not alter the manner in which safety limits, limiting safety systems settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside the design basis. The proposed change does not adversely affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition.

Removal of plant specific TS administrative requirements will not reduce a margin of safety because the requirements in 10 CFR Part 26 are adequate to ensure that worker fatigue is managed.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, TVA concludes that the proposed change presents 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

A description of the proposed TS change and its relationship to applicable regulatory requirements was provided in the NRC Notice of Availability published on December 30, 2008 (73 FR 79923). TVA has reviewed the NRC staff's model SE published December 30, 2008 (73 FR 79923), as part of the CLIIP Notice of Availability and concluded that the regulatory evaluation section is applicable to Browns Ferry Nuclear Plant, Units 1, 2, and 3; Sequoyah Nuclear Plant, Units 1 and 2; and Watts Bar Nuclear Plant, Unit 1.

The proposed change eliminates the plant-specific TS administrative controls on working hours. The TS guidance has been superseded by 10 CFR Part 26.

10 CFR Part 26, Subpart I, "Managing Fatigue," contains requirements for managing worker fatigue at operating nuclear power plants.

10 CFR 50.36 provides, among other things, the regulatory requirements for the content in the Administrative Controls section of the TSs. The inclusion of requirements to control working hours and manage fatigue is not required to be in the Administrative Controls by 10 CFR Part 50.36. Because the requirement to control working hours and manage fatigue is provided in 10 CFR Part 26, Subpart I, it is unnecessary for the TSs to contain similar controls.

6.0 ENVIRONMENTAL CONSIDERATION

TVA has reviewed the environmental evaluation included in the SE published on December 30, 2008 (73 FR 79923), as part of the CLIIP Notice of Availability. TVA has concluded that the staff's findings presented in that evaluation are applicable to Browns Ferry Nuclear Plant, Units 1, 2 and 3; Sequoyah Nuclear Plant, Units 1 and 2; and Watts Bar Nuclear Plant, Unit 1. The proposed amendment changes recordkeeping, reporting, or administrative procedures. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

7.0 REFERENCES

1. Federal Register Notice, Final Rule 10 CFR Part 26 published on March 31, 2008.

2. TSTF-511, Revision 0, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26"

3. Federal Register Notice, Notice of Availability published on December 30, 2008 (73 FR 79923)

ENCLOSURE 2

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Proposed Technical Specifications Changes (Mark-Up)

5.0-3
5.0-4

6 pages follow

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

When all three units are shutdown or defueled, a total of three non-licensed operators shall be assigned for all three units.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. ~~Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), radiological controls technicians, auxiliary operators, and key maintenance personnel).~~DELETED

5.2 Organization

5.2.2 Unit Staff (continued)

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~

~~Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assign~~

(continued)

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

When all three units are shutdown or defueled, a total of three non-licensed operators shall be assigned for all three units.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. ~~Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), radiological controls technicians, auxiliary operators, and key maintenance personnel).~~DELETED

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~

~~Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned~~

(continued)

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

When all three units are shutdown or defueled, a total of three non-licensed operators shall be assigned for all three units.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. ~~Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), radiological controls technicians, auxiliary operators, and key maintenance personnel).~~DELETED

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~

~~Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned~~

(continued)

ENCLOSURE 3

Sequoyah Nuclear Plant, Units 1 and 2
Proposed Technical Specifications Changes (Mark-Up)

6-2

2 pages follow

c. A Radiological Control technician# shall be onsite when fuel is in the reactor.

d. DELETED

e. DELETED

f. The Operations Superintendent shall hold a Senior Reactor Operator license.

g. ~~Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., senior reactor operators [SROs], licensed reactor operators [ROs], health physicists, assistant unit operators [AUOs], and key maintenance personnel).~~

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~

~~Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.~~DELETED

h. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

#The Radiological Control technician may be offsite for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

c. A Radiological Control technician# shall be onsite when fuel is in the reactor.

d. DELETED

e. DELETED

f. The Operations Superintendent shall hold a Senior Reactor Operator license.

g. ~~Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., senior reactor operators [SROs], licensed reactor operators [ROs], health physicists, assistant unit operators [AUOs], and key maintenance personnel).~~

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~

~~Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.~~DELETED

h. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

#The Radiological Control technician may be offsite for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

ENCLOSURE 4

Watts Bar Nuclear Plant, Unit 1
Proposed Technical Specifications Changes (Mark-Up)

5.0-3

1 page follows

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is being operated in MODES 1, 2, 3, or 4.

b. The shift crew composition may be less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absences of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. ~~Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), radiological controls technicians, auxiliary operators, and key maintenance personnel).~~

~~The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.~~

~~Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.~~

~~Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.~~DELETED

e. The Operations Superintendent shall have a valid SRO license on this unit.

(continued)

ENCLOSURE 5

Browns Ferry Nuclear Plant, Units 1, 2 and 3
Proposed Technical Specifications Changes (Re-Typed)

5.0-3
5.0-4

6 pages follow

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

When all three units are shutdown or defueled, a total of three non-licensed operators shall be assigned for all three units.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. DELETED

5.2 Organization

5.2.2 Unit Staff (continued)

(continued)

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

When all three units are shutdown or defueled, a total of three non-licensed operators shall be assigned for all three units.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. DELETED

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

(continued)

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

When all three units are shutdown or defueled, a total of three non-licensed operators shall be assigned for all three units.

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. DELETED

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

(continued)

ENCLOSURE 6

Sequoyah Nuclear Plant, Units 1 and 2
Proposed Technical Specifications Changes (Re-Typed)

6-2

2 pages follow

c. A Radiological Control technician# shall be onsite when fuel is in the reactor.

d. DELETED

e. DELETED

f. The Operations Superintendent shall hold a Senior Reactor Operator license.

g. DELETED

h. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

#The Radiological Control technician may be offsite for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

c. A Radiological Control technician# shall be onsite when fuel is in the reactor.

d. DELETED

e. DELETED

f. The Operations Superintendent shall hold a Senior Reactor Operator license.

g. DELETED

h. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

#The Radiological Control technician may be offsite for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

ENCLOSURE 7

Watts Bar Nuclear Plant, Unit 1
Proposed Technical Specifications Changes (Re-Typed)

5.0-3

1 page follows

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is being operated in MODES 1, 2, 3, or 4.

b. The shift crew composition may be less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absences of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

c. A radiological controls technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. DELETED

e. The Operations Superintendent shall have a valid SRO license on this unit.

(continued)