

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

CNL-17-067

June 29, 2017

10 CFR 50.90

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

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

SUBJECT: Administrative Changes to Proposed Revised Technical Specification Pages Related to Browns Ferry Nuclear Plant Application to Revise Technical Specifications to Adopt TSTF-545, Rev. 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing," to Request an Alternative to the ASME Code, and to Implement Administrative TSTF-299, Rev. 0, "Administrative Controls Program 5.5.2.b Test Interval and Exception" (BFN-TS-495) (CAC Nos. MF9084, MF9085, MF9086)

REFERENCE:

CNL-16-155, Letter from TVA to NRC, "Application to Revise Technical Specifications to Adopt TSTF 545, Rev. 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing," to Request an Alternative to the ASME Code, and to Implement Administrative TSTF-299, Rev. 0, "Administrative Controls Program 5.5.2.b Test Interval and Exception" (BFN-TS-495)," dated January 17, 2017 (ML17018A149)

By letter dated January 17, 2017 (Reference), the Tennessee Valley Authority (TVA) submitted a request for an amendment to the Technical Specifications (TS) for Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3. The proposed change revises the Technical Specifications (TS) to eliminate the "Inservice Testing Program," contained in TS Section 5.5.6 and replace the program with a new defined term, "Inservice Testing Program," in the TS Definitions section. The referenced request is consistent with TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing."

After a teleconference was held with TVA and NRC, TVA determined that minor administrative changes to the proposed revised TS pages were appropriate and would ensure consistency between the license amendment request (LAR) and TSTF-545, Revision 3.

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The following pages are affected:

BFN, Unit 1, TS pages 5.0-12 and 5.0-13 BFN, Unit 2, TS pages 5.0-12 and 5.0-13 BFN, Unit 3, TS pages 5.0-12 and 5.0-13

The proposed change for each Unit on page 5.0-12 is to include the word "(Deleted)" in the title of TS Section 5.5.6. The proposed change for each Unit on page 5.0-13 is to remove the unused Section number and include the phrase "This page intentionally left blank." Enclosure 1 to this letter contains the revised proposed TS pages (mark-up version) for BFN, Units 1, 2, and 3. Enclosure 2 to this letter contains revised proposed TS pages listed above (clean version) for BFN, Units 1, 2, and 3.

The differences between the proposed revised TS pages included in this letter and the proposed TS pages from the referenced application are minor and administrative in nature. The differences do not affect the description and assessment of the proposed TS changes included as Enclosure 1 to the referenced application. All other proposed TS changes included in the referenced application are unaffected by these differences.

Consistent with the standards set forth in 10 CFR 50.92(c), TVA has determined that the revised proposed TS pages do not affect the no significant hazards consideration determination associated with the referenced application.

There are no new regulatory commitments associated with this submittal. If you should have any questions regarding this submittal, please contact Ed Schrull at (423) 751-3850.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of June 2017.

Sincerely,

In for

Joseph W. Shea Vice President - Nuclear Regulatory Affairs & Support Services

Enclosures

cc: See Page 3

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Enclosures

- 1. Revised Proposed Technical Specification Pages (Mark-Up)
- 2. Revised Proposed Technical Specification Pages (Clean)

cc:(Enclosures)

NRC Regional Administrator - Region II NRC Senior Resident Inspector - Browns Ferry Nuclear Plant NRC Project Manager - Browns Ferry Nuclear Plant State Health Officer, Alabama State Department of Public Health NRC Branch Chief - Region II

ENCLOSURE 1

Revised Proposed Technical Specification Pages (Mark-Up)

Attachments:

- 1. Browns Ferry Nuclear Plant, Unit 1, Revised Proposed Technical Specification Pages (Mark-Up)
- 2. Browns Ferry Nuclear Plant, Unit 2, Revised Proposed Technical Specification Pages (Mark-Up)
- 3. Browns Ferry Nuclear Plant, Unit 3, Revised Proposed Technical Specification Pages (Mark-Up)

ENCLOSURE 1 Attachment 1

Browns Ferry Nuclear Plant, Unit 1, Revised Proposed Technical Specification Pages (Mark-Up)

5.5.4 <u>Radioactive Effluent Controls Program</u> (continued)

- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.
- k. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.
- 5.5.5 <u>Component Cyclic or Transient Limit</u>

This program provides controls to track the FSAR Section 4.2.5, cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Inservice Testing Program (Deleted)

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:

Note: See Section 1.1 for the definition of INSERVICE TESTING PROGRAM

5.0-12

5.5.6 <u>Inservice Testing Program</u> (continued) (Deleted)

ASME OM Code and applicable Addenda terminology for inservice testing activities

Weekly Monthly Quarterly or every 3 months Semiannually or every 6 months Every 9 months Yearly or annually Biennially or every 2 years Required Frequencies for performing inservice testing activities

At least once per 7 days At least once per 31 days At least once per 92 days At least once per 184 days

At least once per 276 days At least once per 366 days At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Test Program for performing Inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

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ENCLOSURE 1 Attachment 2

Browns Ferry Nuclear Plant, Unit 2, Revised Proposed Technical Specification Pages (Mark-Up)

5.5.4 <u>Radioactive Effluent Controls Program</u> (continued)

- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.
- k. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 <u>Component Cyclic or Transient Limit</u>

This program provides controls to track the FSAR Section 4.2.5, cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Inservice Testing Program (Deleted)

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a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:

Note: See Section 1.1 for the definition of INSERVICE TESTING PROGRAM

5.5.6 <u>Inservice Testing Program</u> (continued) (Deleted)

ASME OM Code and applicable Addenda terminology for inservice testing activities

Weekly Monthly Quarterly or every 3 months Semiannually or every 6 months Every 9 months Yearly or annually Biennially or every 2 years Required Frequencies for performing inservice testing activities

At least once per 7 days At least once per 31 days At least once per 92 days At least once per 184 days

At least once per 276 days At least once per 366 days At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Test program for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

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ENCLOSURE 1 Attachment 3

Browns Ferry Nuclear Plant, Unit 3, Revised Proposed Technical Specification Pages (Mark-Up)

5.5.4 <u>Radioactive Effluent Controls Program</u> (continued)

- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.
- k. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 <u>Component Cyclic or Transient Limit</u>

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Note: See Section 1.1 for the definition of INSERVICE TESTING PROGRAM

(continued)

BFN-UNIT 3

5.5.6 <u>Inservice Testing Program</u> (continued) (Deleted)

ASME OM Code and applicable Addenda terminology for inservice testing activities

Weekly Monthly Quarterly or every 3 months Semiannually or every 6 months Every 9 months Yearly or annually Biennially or every 2 years Required Frequencies for performing inservice testing activities

At least once per 7 days At least once per 31 days At least once per 92 days At least once per 184 days

At least once per 276 days At least once per 366 days At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Test Program for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

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ENCLOSURE 2

Revised Proposed Technical Specification Pages (Clean)

Attachments:

- 1. Browns Ferry Nuclear Plant, Unit 1, Revised Proposed Technical Specification Pages (Clean)
- 2. Browns Ferry Nuclear Plant, Unit 2, Revised Proposed Technical Specification Pages (Clean)
- 3. Browns Ferry Nuclear Plant, Unit 3, Revised Proposed Technical Specification Pages (Clean)

ENCLOSURE 2 Attachment 1

Browns Ferry Nuclear Plant, Unit 1, Revised Proposed Technical Specification Pages (Clean)

5.5.4 <u>Radioactive Effluent Controls Program</u> (continued)

- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
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5.5.5 <u>Component Cyclic or Transient Limit</u>

This program provides controls to track the FSAR Section 4.2.5, cyclic and transient occurrences to ensure that components are maintained within the design limits.

- 5.5.6 <u>Inservice Testing Program (Deleted)</u>
 - Note: See Section 1.1 for the definition of INSERVICE TESTING PROGRAM.

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BFN-UNIT 1

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ENCLOSURE 2 Attachment 2

Browns Ferry Nuclear Plant, Unit 2, Revised Proposed Technical Specification Pages (Clean)

5.5.4 <u>Radioactive Effluent Controls Program</u> (continued)

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ENCLOSURE 2 Attachment 3

Browns Ferry Nuclear Plant, Unit 3, Revised Proposed Technical Specification Pages (Clean)

5.5.4 <u>Radioactive Effluent Controls Program</u> (continued)

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BFN-UNIT 3

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