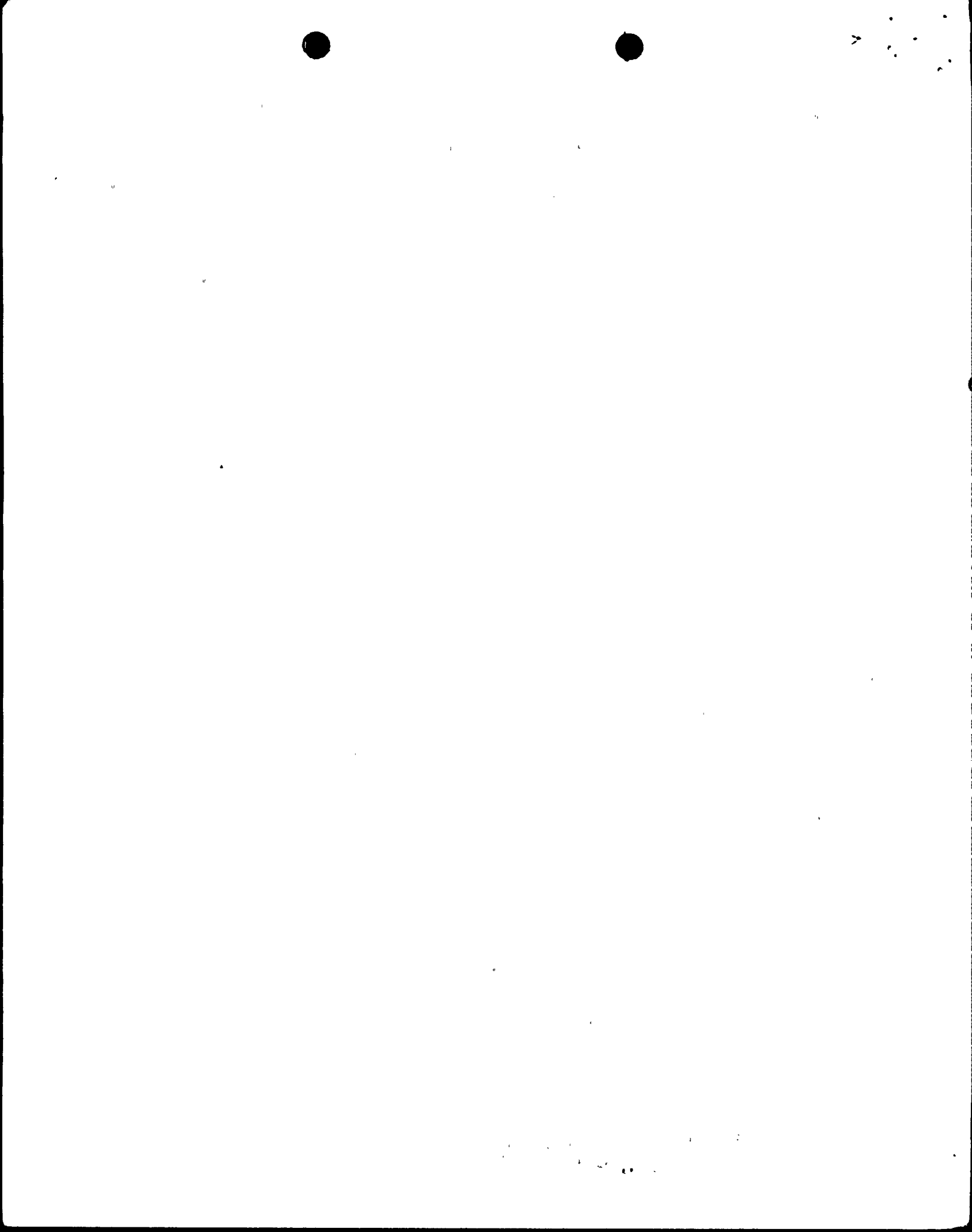


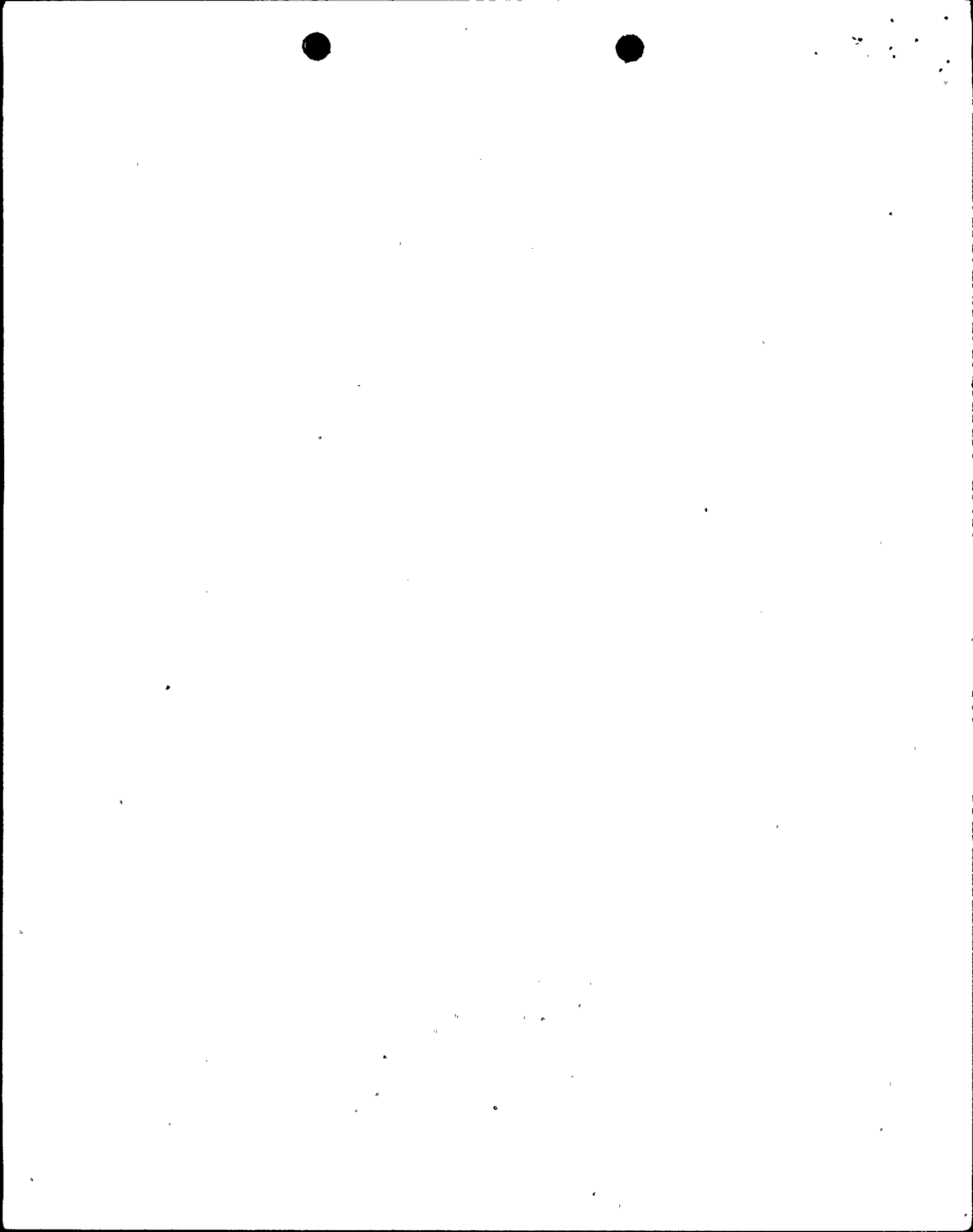
ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION REVISIONS
BROWNS FERRY NUCLEAR PLANT
UNITS 1, 2, AND 3
(TVA BFNP TS 194 SUPPLEMENT 1)

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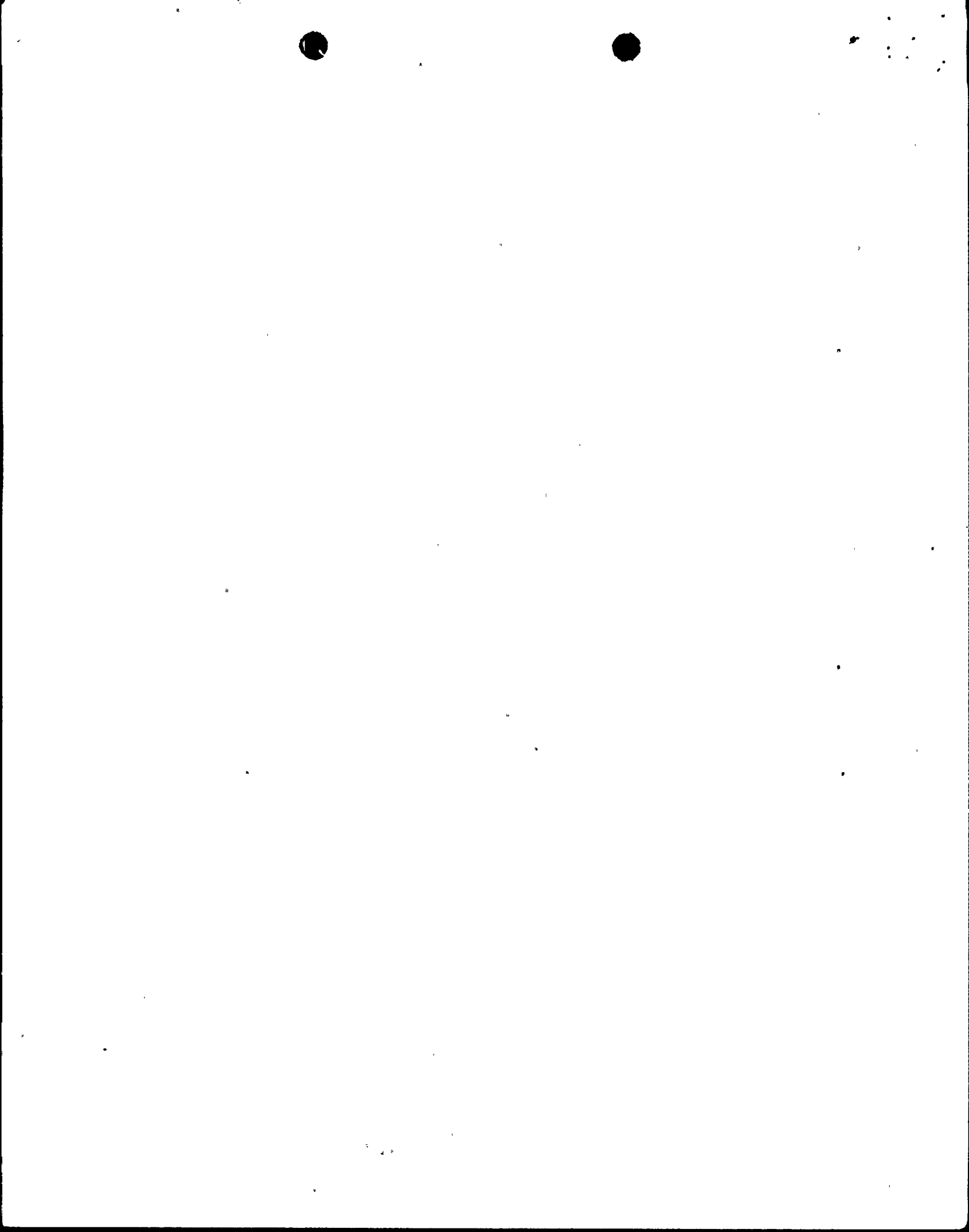


PROPOSED CHANGES
UNIT 1



1.0 DEFINITIONS (Cont'd)

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- X. Shutdown - The reactor is in a shutdown condition when the reactor mode switch is in the shutdown mode position and no core alterations are being performed.
- Y. Engineered Safeguard - An engineered safeguard is a safety system the actions of which are essential to a safety action required in response to accidents.
- Z. Reportable Event - A reportable event shall be any of those conditions specified in section 50.73 to 10 CFR Part 50.



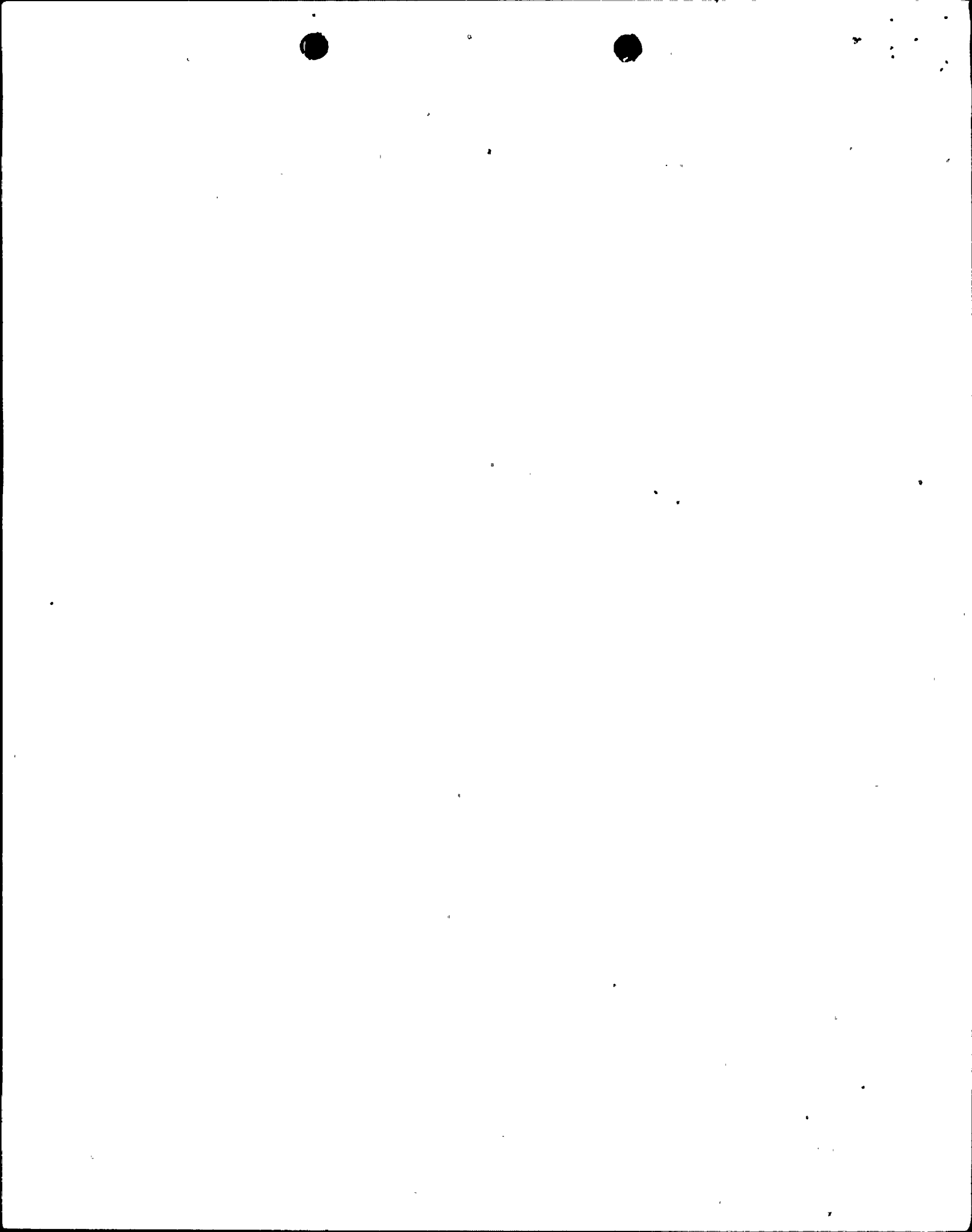
6.0 ADMINISTRATIVE CONTROLS

- g. All reportable events.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meeting minutes of the PORC:

8. AUDITS

Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass.

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
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- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Site Radiological Emergency Plan and implementing procedures at least once per 24 months.
- f. The Plant Physical Security Plan and implementing procedures at least once per 24 months.
- g. Any other area of unit operation considered appropriate by the NSRB or the Manager of Power.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.



6.0 ADMINISTRATIVE CONTROLS

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- d. Investigate reported or suspected incidents involving safety questions, violations of the Technical Specifications, and violations of plant instructions pertinent to nuclear safety.
- e. Review reportable events, unusual events, operating anomalies and abnormal performance of plant equipment.
- f. Maintain a general surveillance of plant activities to identify possible safety hazards.
- g. Review plans for special fuel handling, plant maintenance, operations, and tests or experiments which may involve special safety considerations, and the results thereof, where applicable.
- h. Review adequacy of quality assurance program and recommend any appropriate changes.
- i. Review implementing procedures of the Radiological Emergency Plan and the Industrial Security Program on an annual basis.

6.0 ADMINISTRATIVE CONTROLS

6.4 Actions to be Taken in the Event of a Reportable Event in Plant Operation (Ref. Section 6.7)

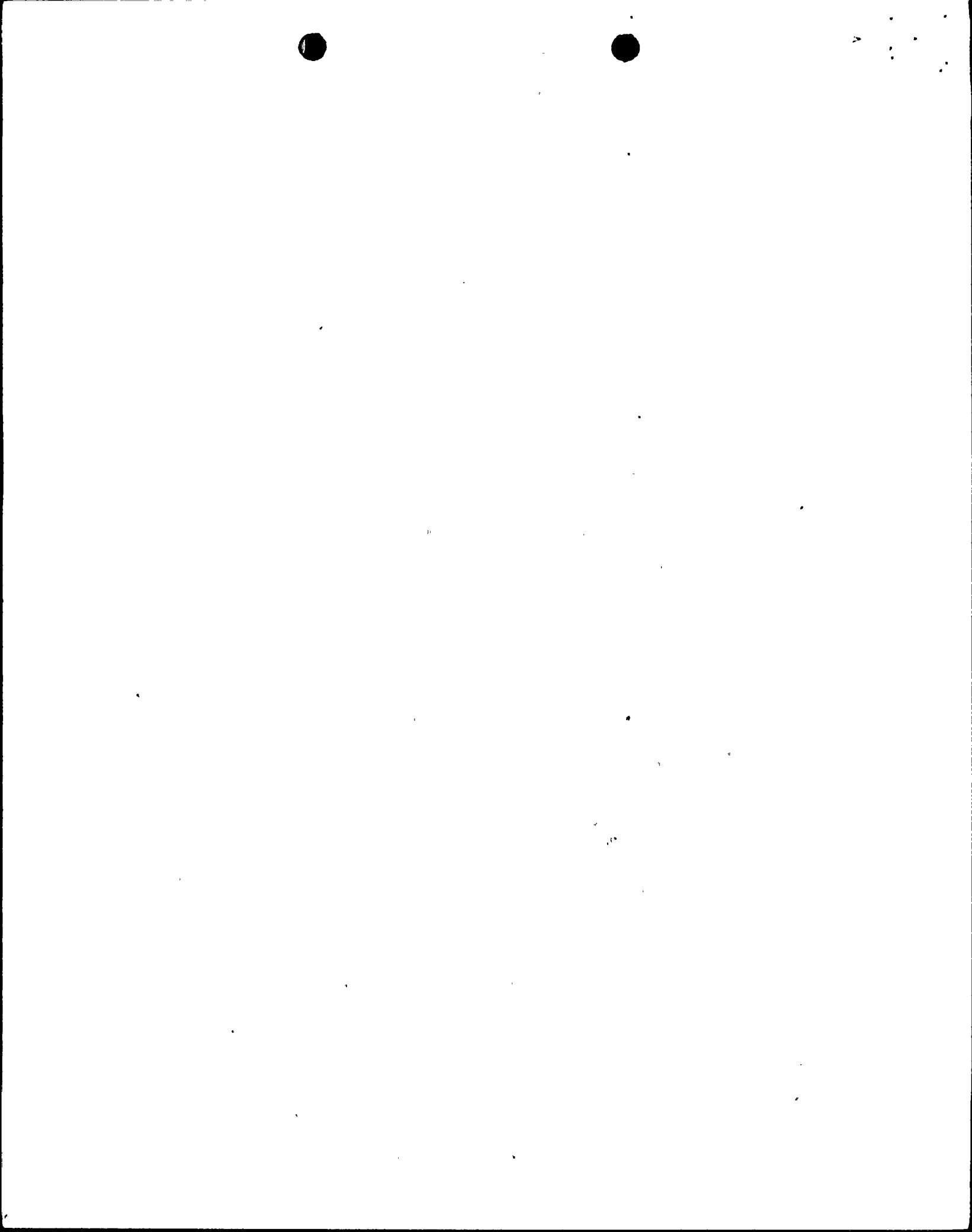
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- B. Copies of all such reports shall be submitted to the Manager Nuclear Production and the Chairman of the NSRB for their review.
- C. The plant superintendent shall notify the NRC as specified in Section 50.73 to 10 CFR Part 50 of the circumstances of any reportable event.

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If a safety limit is exceeded, the reactor shall be shut down and reactor operation shall not be resumed until authorized by the NRC. A prompt report shall be made to the Manager, Nuclear Production, and the Chairman of the NSRB. A complete analysis of the circumstances leading up to and resulting from the situation, together with recommendations to prevent a recurrence, shall be prepared by the PORC. This report shall be submitted to the Manager, Nuclear Production and the NSRB. Notification of such occurrences will be made to the NRC by the plant superintendent within 24 hours.

6.6 Station Operating Records

- A. Records and/or logs shall be kept in a manner convenient for review as indicated below:
 1. All normal plant operation including such items as power level, fuel exposure, and shutdowns.
 2. Principal maintenance activities.
 3. Reportable Events



6.0 ADMINISTRATIVE CONTROLS

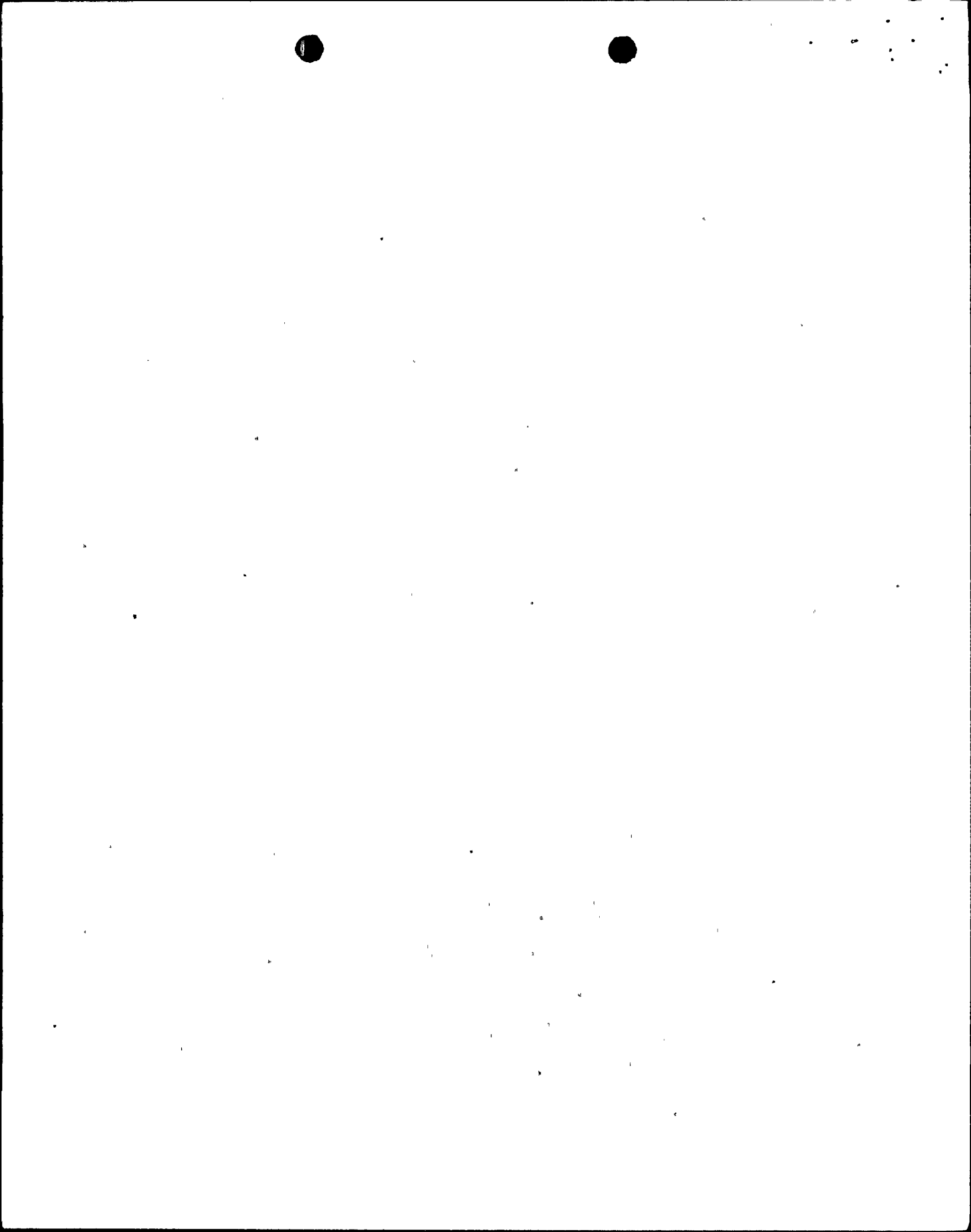
(b). Annual Operating Report

A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

- c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, with a copy to the appropriate Regional Office, to be submitted no later than the tenth of each month following the calendar month covered by the report. A narrative summary of operating experience shall be submitted in the above schedule.

2. Reportable Events

- Reportable events, including corrective actions and measures to prevent recurrence, shall be reported to the NRC in accordance with Section 50.73 to 10 CFR 50.



6.0 ADMINISTRATIVE CONTROLS

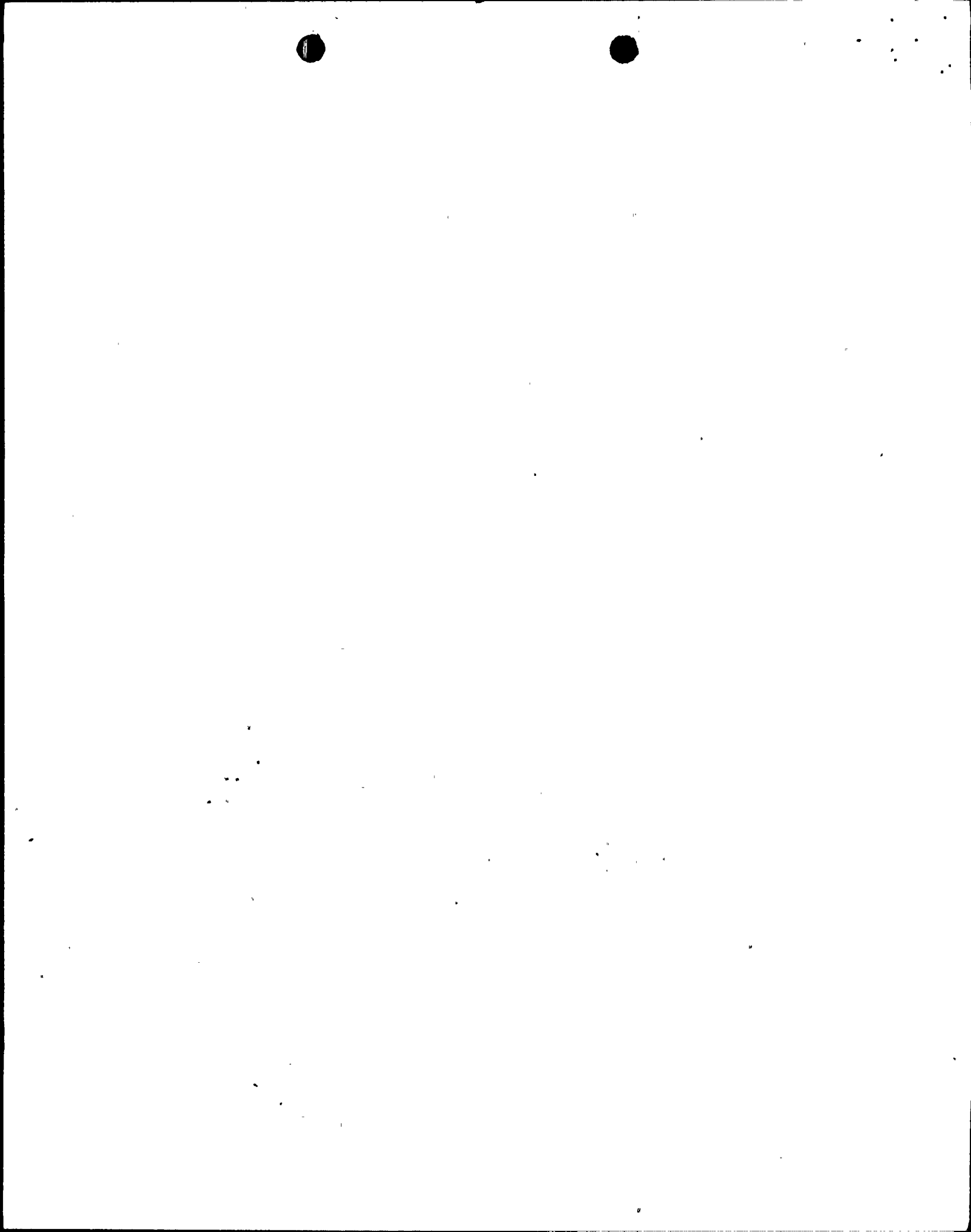
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6.0 ADMINISTRATIVE CONTROLS

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3. Unique Reporting Requirements

A. Radioactive Effluent Release Report

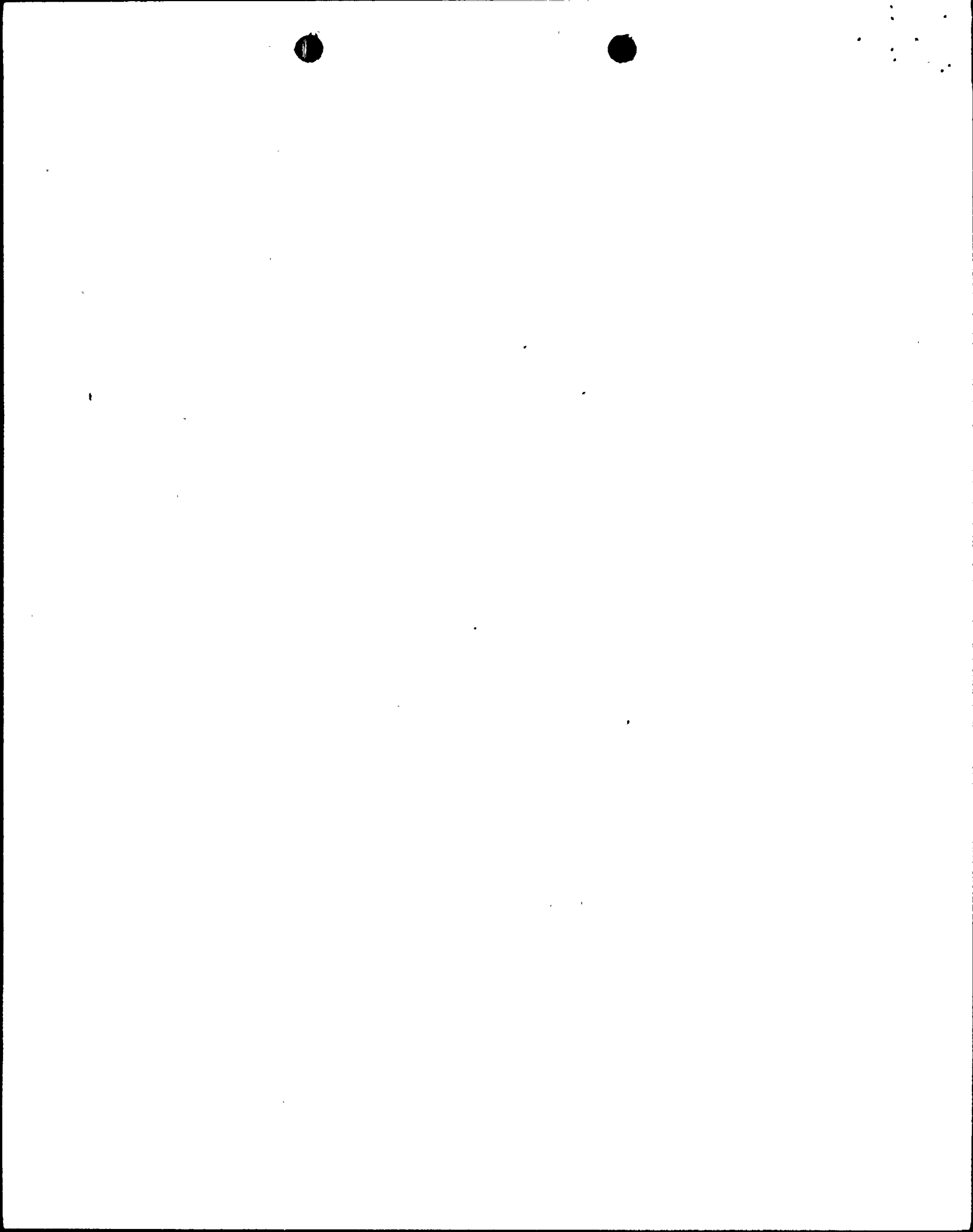
A report on the radioactive discharges released from the site during the previous 6 months of operation shall be submitted to the Director of the Regional Office of Inspection and Enforcement within 60 days after January 1 and July 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents released and solid waste shipped from the plant as delineated in Regulatory Guide 1.21, Revision 1, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," with data summarized on a quarterly basis following the format of Appendix B thereof.

The report shall include a summary of the meteorological conditions concurrent with the release of gaseous effluents during each quarter as outlined in Regulatory Guide 1.21, Revision 1, with data summarized on a quarterly basis following the format of Appendix B thereof. Calculated offsite dose to humans resulting from the release of effluents and their subsequent dispersion in the atmosphere shall be reported as recommended in Regulatory Guide 1.21, Revision 1.



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PROPOSED CHANGES
UNIT 2



1.0 DEFINITIONS (Cont'd)

10. Logic - A logic is an arrangement of relays, contacts, and other components that produces a decision output.
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6.0 ADMINISTRATIVE CONTROLS

- g. All reportable events.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meeting minutes of the PORC.

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- e. The Site Radiological Emergency Plan and implementing procedures at least once per 24 months.
- f. The Plant Physical Security Plan and implementing procedures at least once per 24 months.
- g. Any other area of unit operation considered appropriate by the NSRB or the Manager of Power.
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- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

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- f. Maintain a general surveillance of plant activities to identify possible safety hazards.
- g. Review plans for special fuel handling, plant maintenance, operations, and tests or experiments which may involve special safety considerations, and the results thereof, where applicable.
- h. Review adequacy of quality assurance program and recommend any appropriate changes.
- i. Review implementing procedures of the Radiological Emergency Plan and the Industrial Security Program on an annual basis.

6.0 ADMINISTRATIVE CONTROLS

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- A. Any reportable event shall be promptly reported to the Manager, Nuclear Production and shall be promptly reviewed by PORC. This committee shall prepare a separate report for each reportable event. This report shall include an evaluation of the cause of the event and recommendations for appropriate action to prevent or reduce the probability of a repetition of the event.
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6.6 Station Operating Records

- A. Records and/or logs shall be kept in a manner convenient for review as indicated below:
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 - 2. Principal maintenance activities.
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6.0 ADMINISTRATIVE CONTROLS

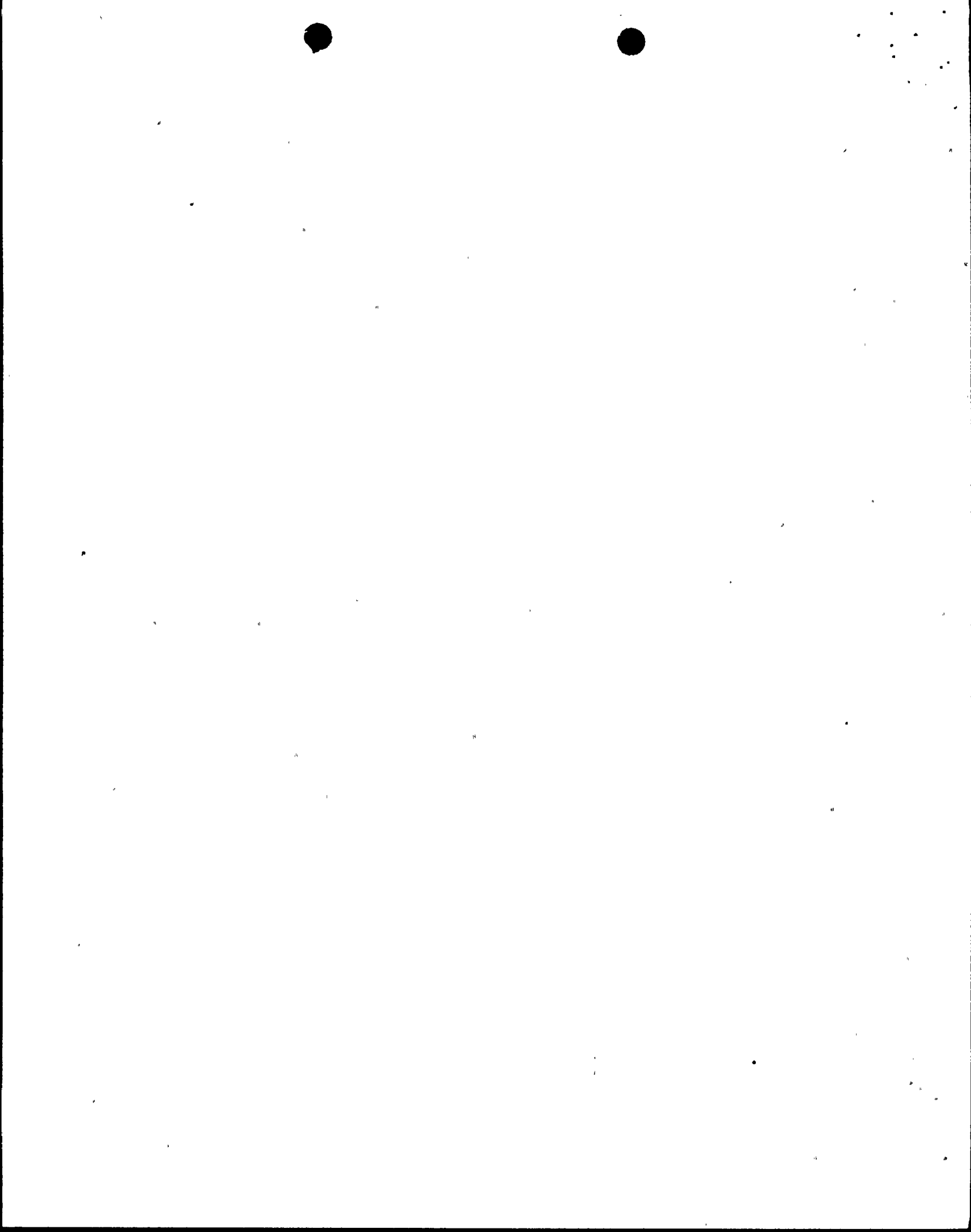
(b). Annual Operating Report

A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

- c. Monthly Operating Report. Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, with a copy to the appropriate Regional Office, to be submitted no later than the tenth of each month following the calendar month covered by the report. A narrative summary of operating experience shall be submitted in the above schedule.

2. Reportable Events

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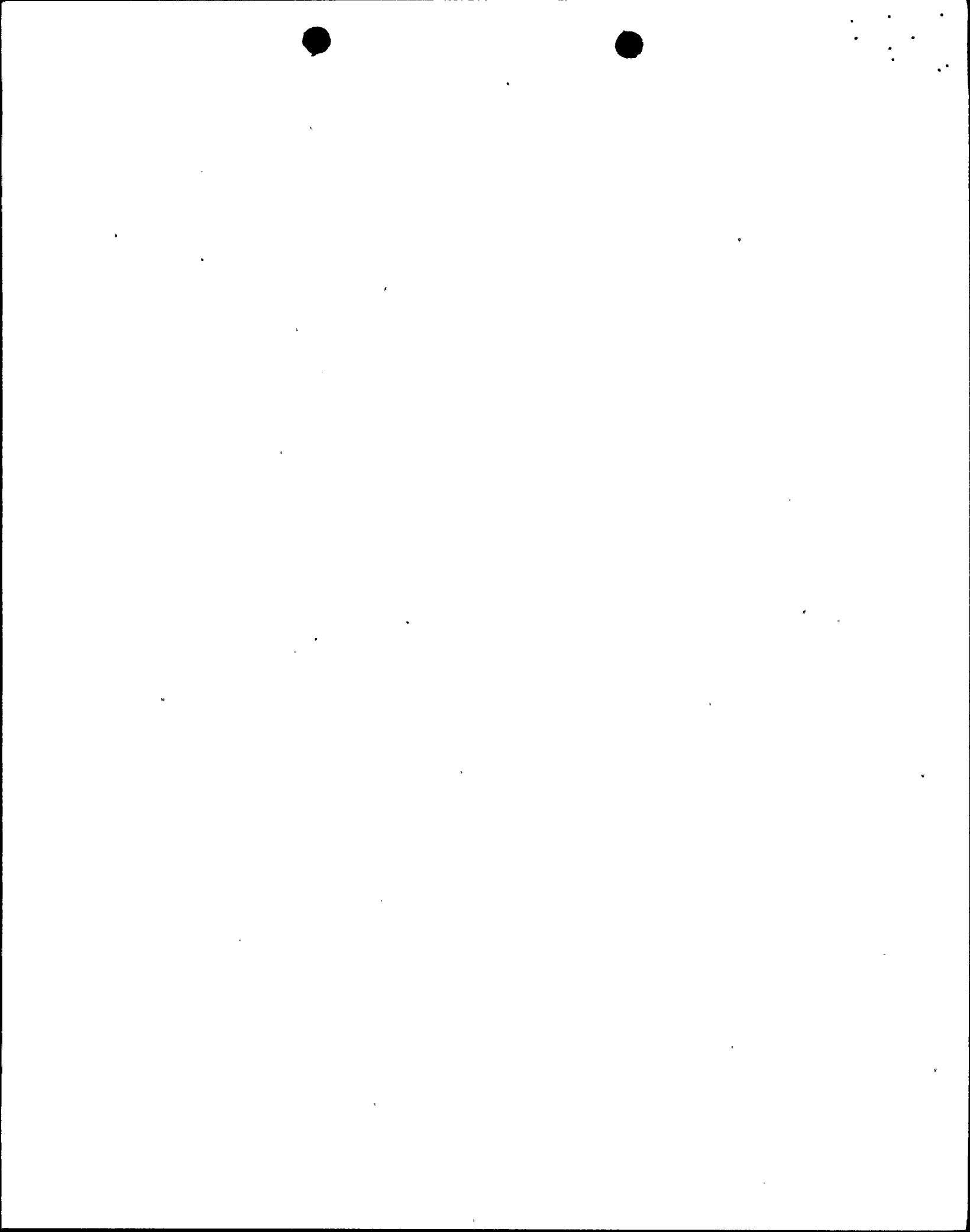


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6.0 ADMINISTRATIVE CONTROLS

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PROPOSED CHANGES
UNIT 3

a protective trip function. A trip system may require one or more instrument channel trip signals related to one or more plant parameters in order to initiate trip system action. Initiation of protective action may require the tripping of a single trip system or the coincident tripping of two trip systems.

7. Protective Action - An action initiated by the protection system when a limit is reached. A protective action can be at a channel or system level.
8. Protective Function - A system protective action which results from the protective action of the channels monitoring a particular plant condition.
9. Simulated Automatic Actuation - Simulated automatic actuation means applying a simulated signal to the sensor to actuate the circuit in question.
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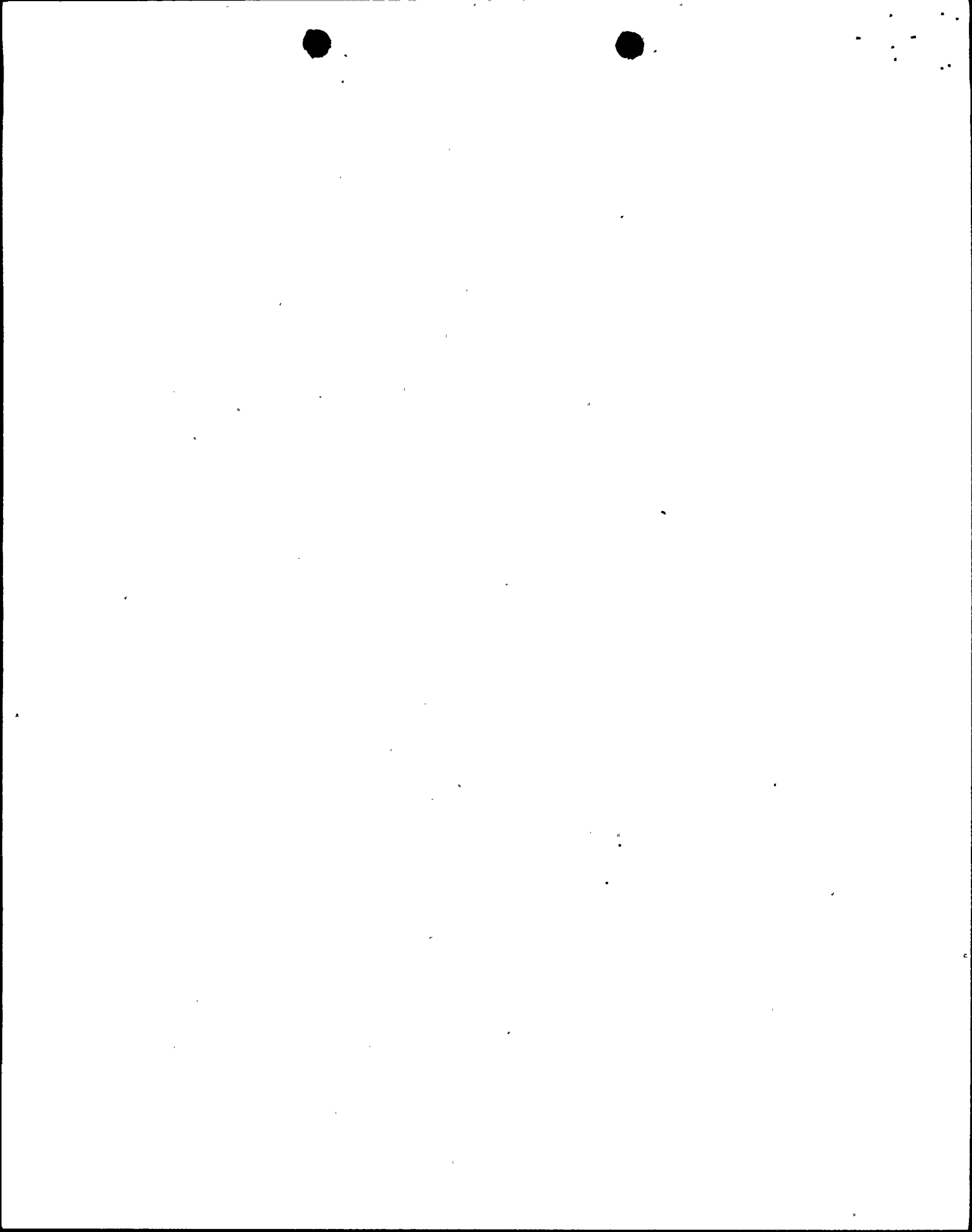
6.0 ADMINISTRATIVE CONTROLS

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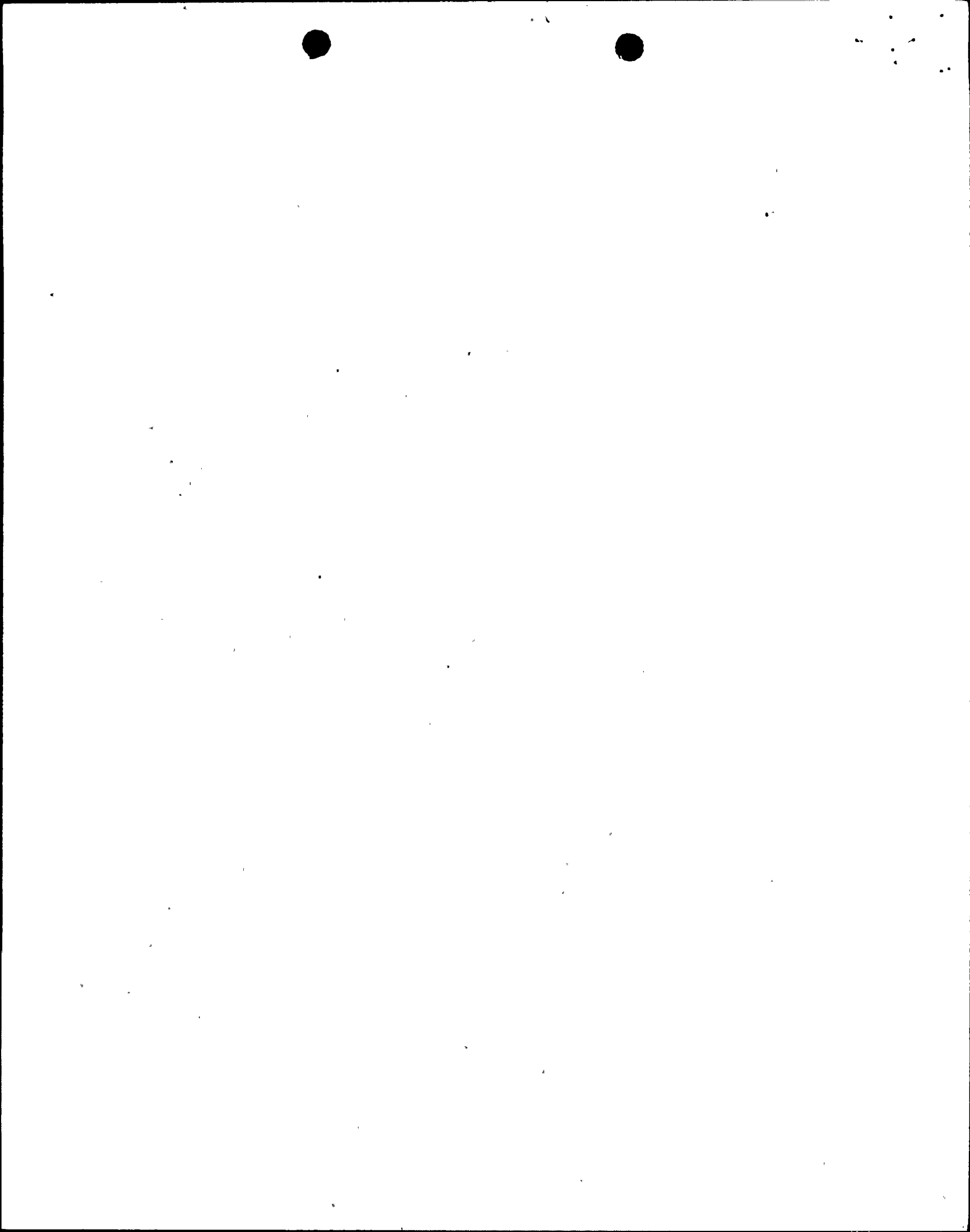
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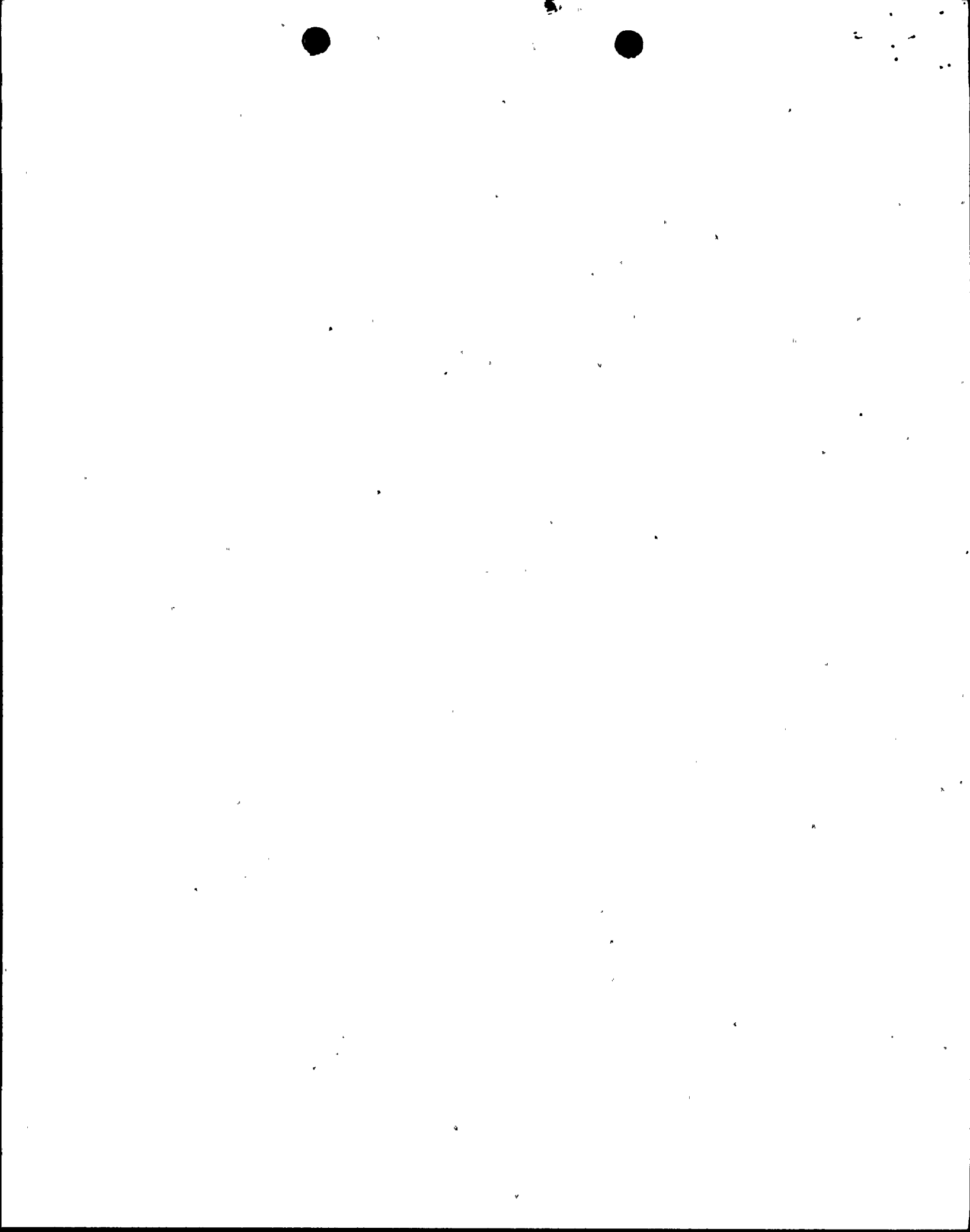
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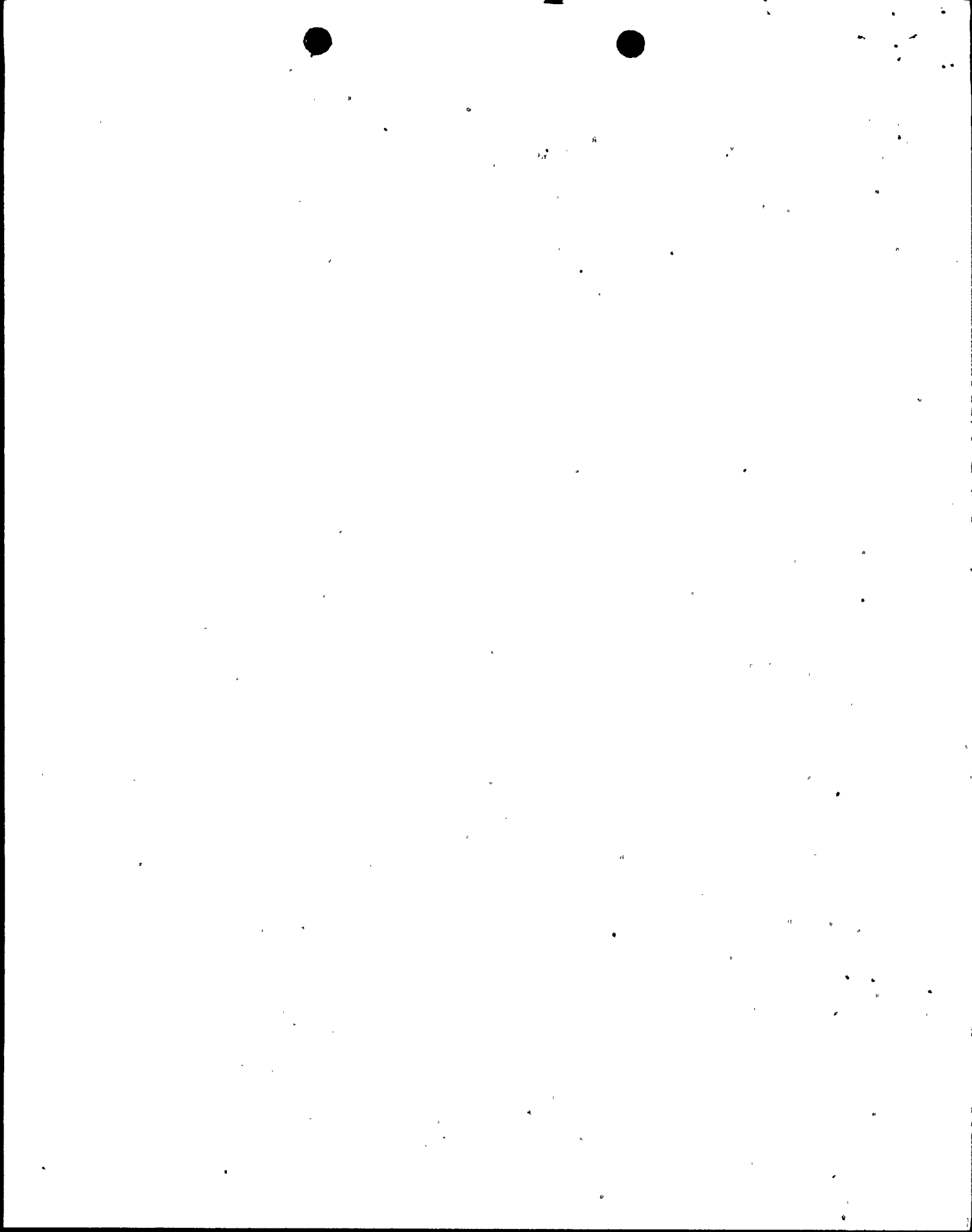
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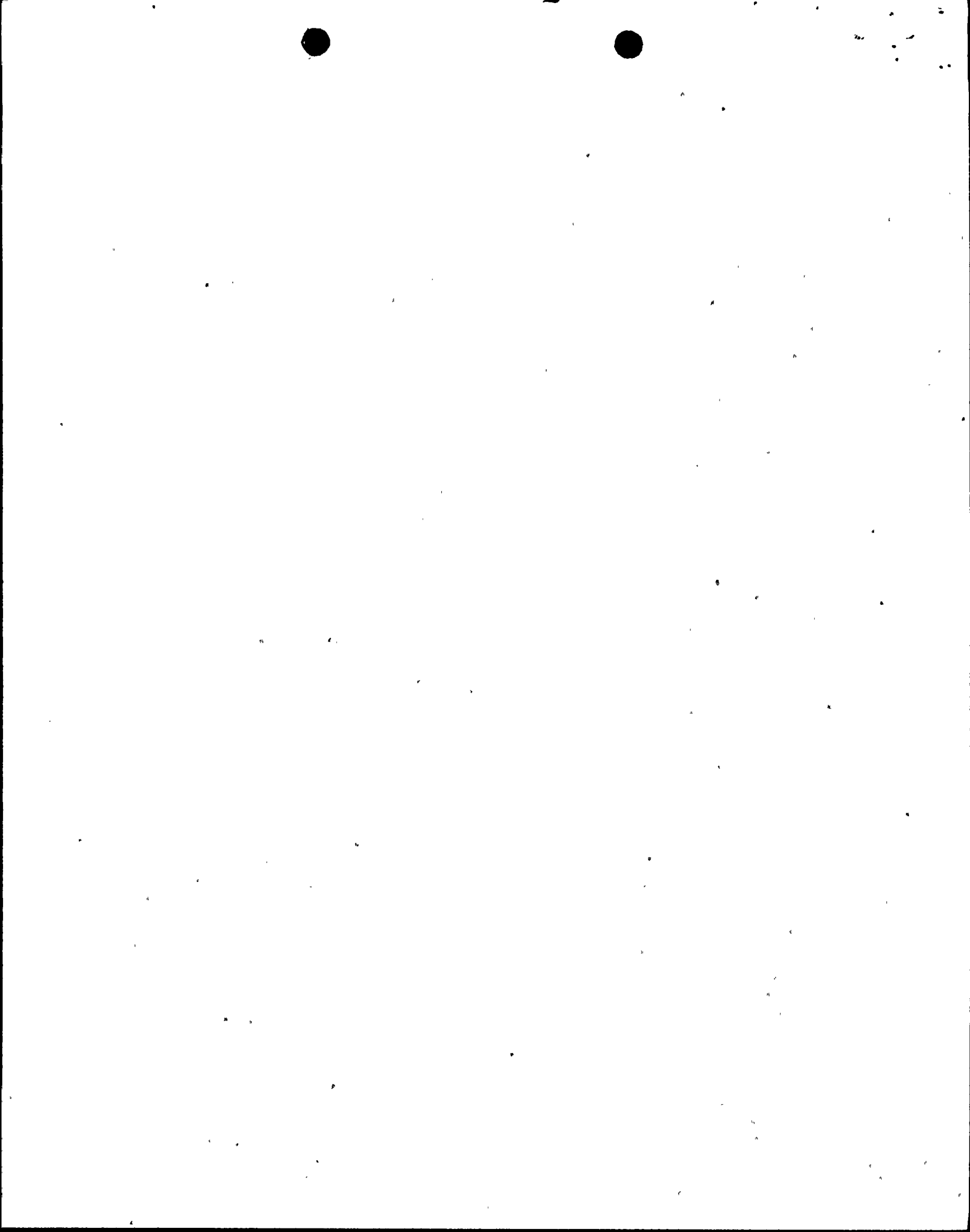
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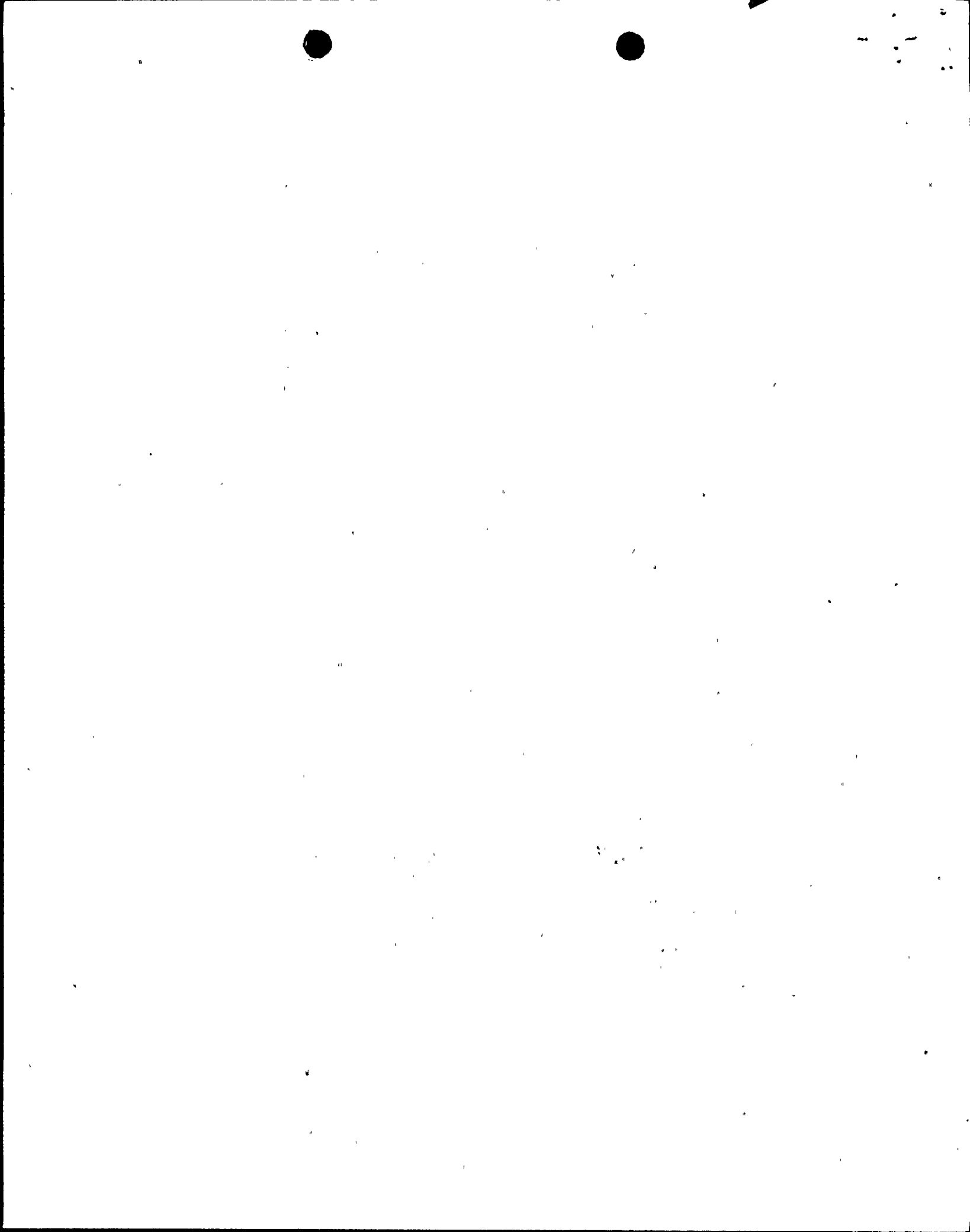
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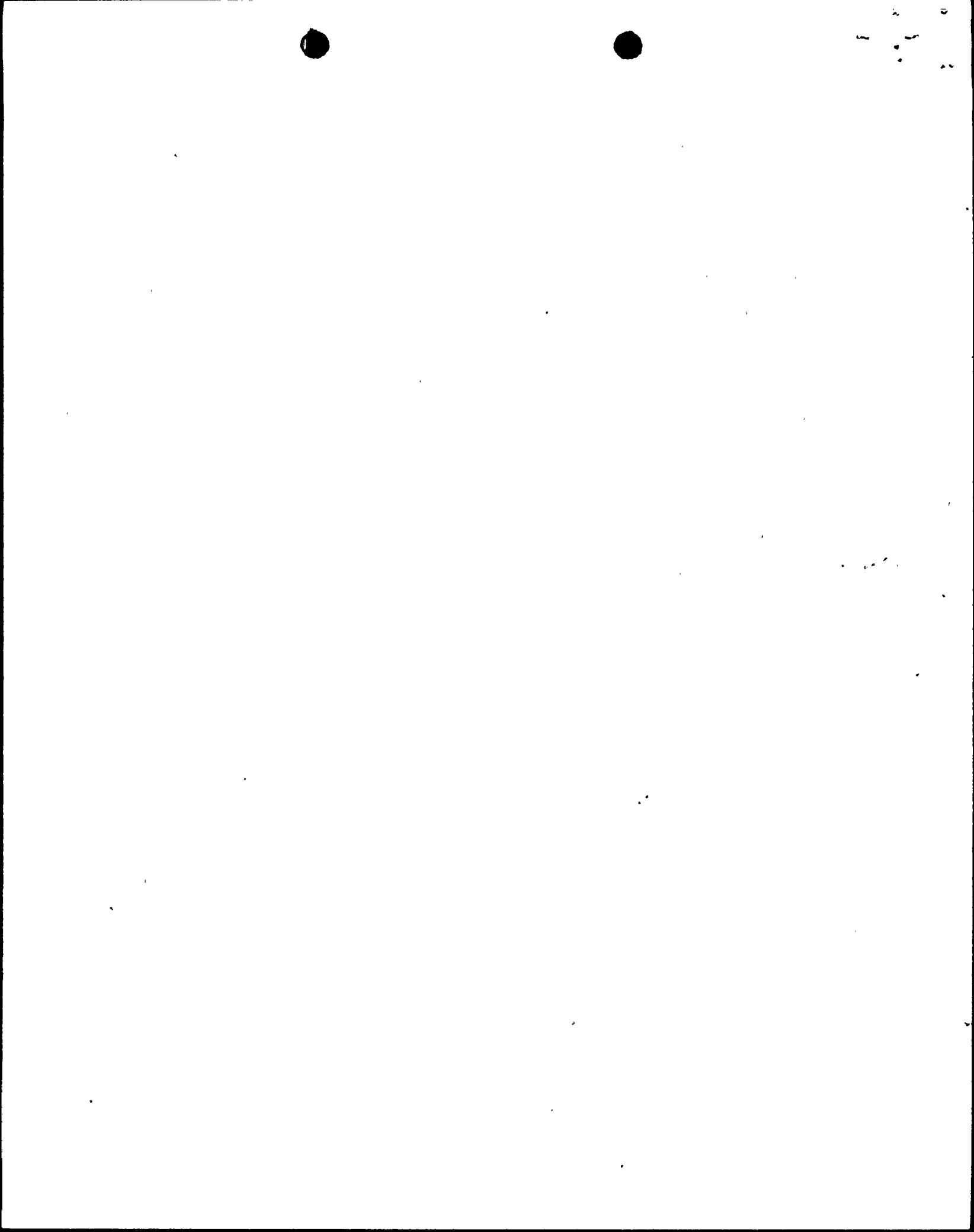


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ENCLOSURE 2

BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3
NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION
(TVA BFNP TS 194 SUPPLEMENT 1)

Description

This change will update the technical specification requirements for reporting LERs to be compatible with the new section (50.73) and 10 CFR 50 and corrects job titles where appropriate. In section 6.4 and 6.5, the copy of the Manager of Power was deleted, making this area compatible with BWR Standard Technical Specifications.

Basis for Proposed No Significant Hazards Consideration Determination

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards consideration relates to a change to make a license conform to changes in the regulations where the license change relates in very minor changes to facility operations clearly in keeping with the regulations. The proposed amendment is encompassed by this example in that the revision is being made to incorporate the reporting requirements of 10 CFR 50.73 which became effective January 1, 1984. The proposed revision has no effect on either limiting condition of operations (LCOs) or surveillance requirements but only changes the Licensee Event Report (LER) reporting requirements to reflect those adopted by NRC in 10 CFR 50.73. On this basis, TVA proposes to determine that the proposed amendment does not involve a significant hazards consideration.

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