

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION REVISIONS  
BROWNS FERRY NUCLEAR PLANT  
(TVA BFNP TS 205)

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UNIT 1 PROPOSED SPECIFICATIONS

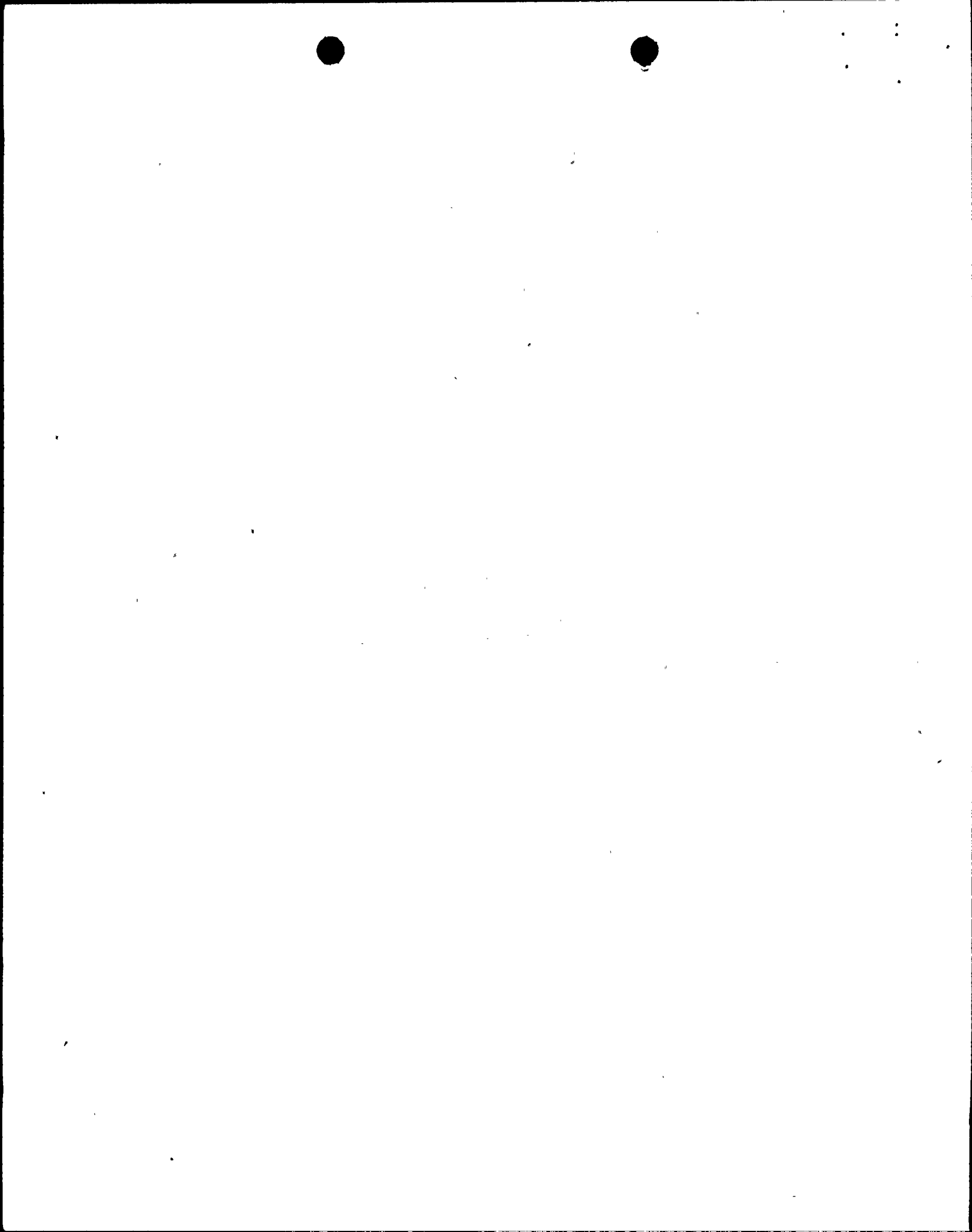
## 6.0 ADMINISTRATIVE CONTROLS

### 4. Duties and Responsibilities

The PORC serves in an advisory capacity to the plant superintendent and as an investigating and reporting body to the Nuclear Safety Review Board in matters related to safety in plant operations. The plant superintendent has the final responsibility in determining the matters that should be referred to the Nuclear Safety Review Board.

The responsibility of the committee will include:

- a. Review all standard and emergency operating and maintenance instructions and any proposed revisions thereto, with principal attention to provisions for safe operation.
- b. Review proposed changes to the Technical Specifications.
- c. Review proposed changes to equipment or systems having safety significance.
- 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. (DELETED)
- i. Review implementing procedures of the Radiological Emergency Plan and the Industrial Security Program.



6.0 ADMINISTRATIVE CONTROLS

j. (DELETED)

5. Authority

The PORC shall be advisory to the plant superintendent.

6. Records

Minutes shall be kept for all PORC meetings with copies sent to Director, Nuclear Power; Assistant Director of Nuclear Power (Operations); Chairman, NSRB.

7. Procedures

Written administrative procedures for committee operation shall be prepared and maintained describing the method for submission and content of presentations to the committee, review and approval by members of committee actions, dissemination of minutes, agenda and scheduling of meetings.

UNIT 2 PROPOSED SPECIFICATIONS

## 6.0 ADMINISTRATIVE CONTROLS

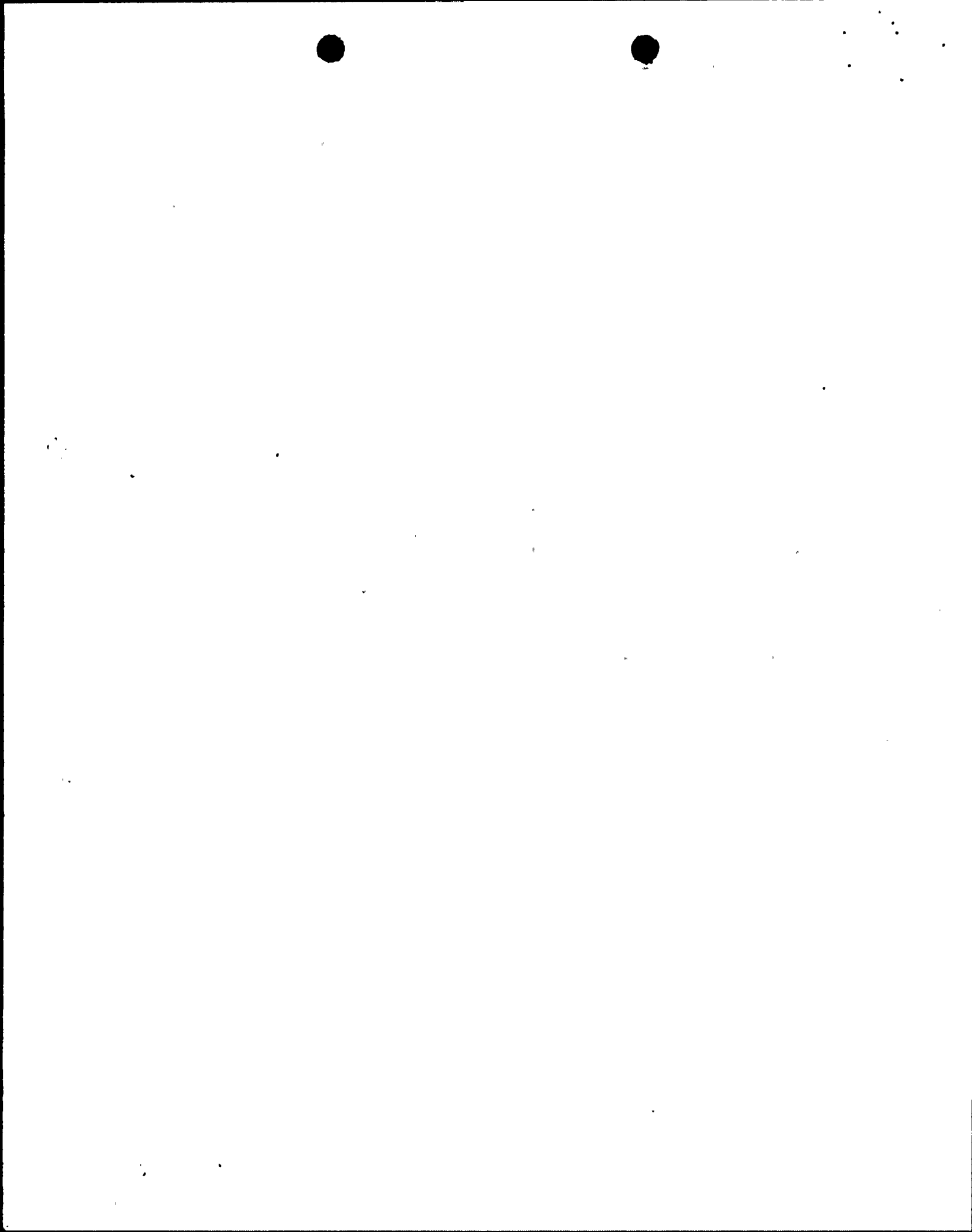
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UNIT 3 PROPOSED SPECIFICATIONS

## 6.0 ADMINISTRATIVE CONTROLS

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6.0 ADMINISTRATIVE CONTROLS

j. (DELETED)

5. Authority

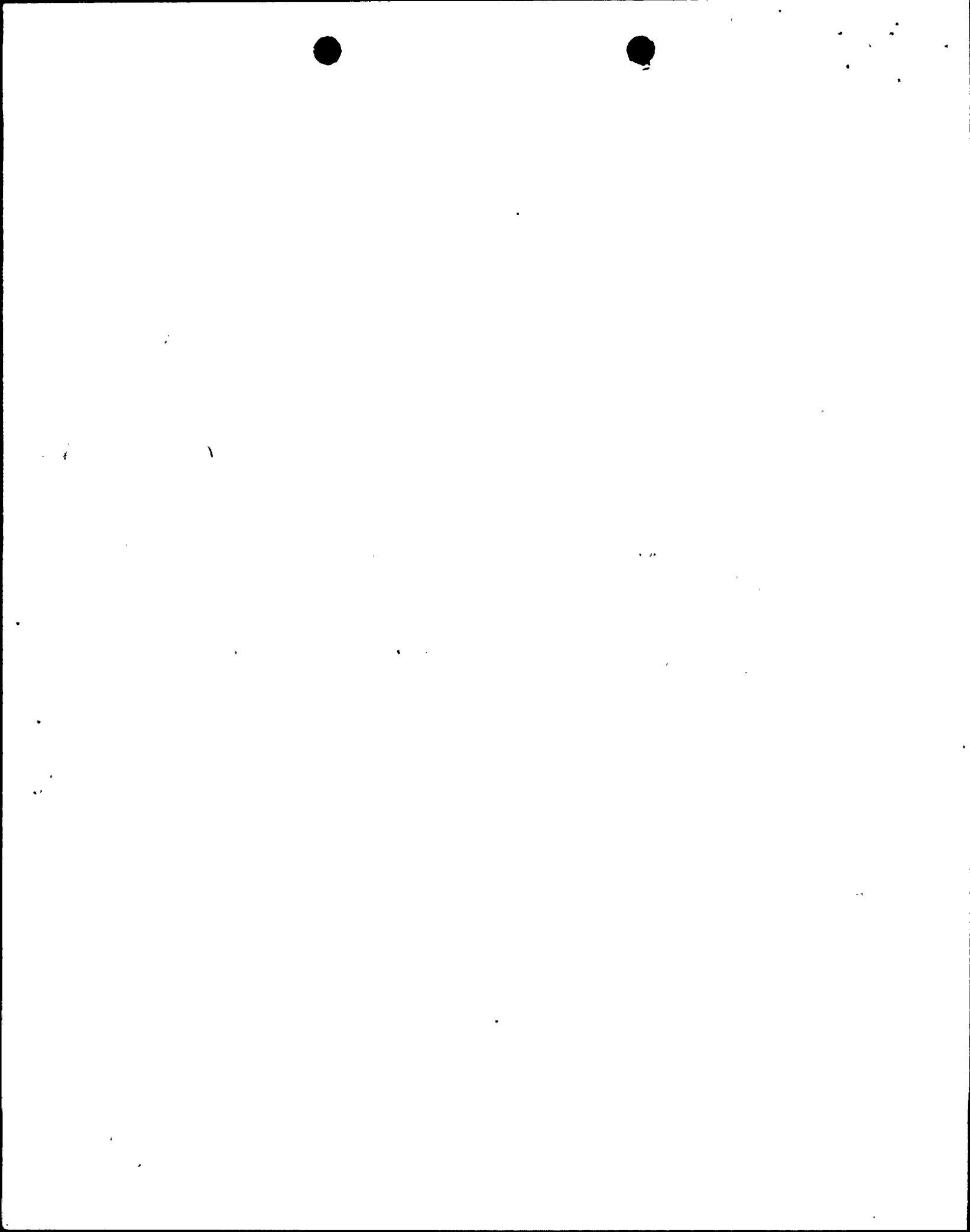
The PORC shall be advisory to the plant superintendent.

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ENCLOSURE 2

DESCRIPTION AND JUSTIFICATION OF CHANGES  
(TVA BFN TS 205)

Description of Proposed Changes

Units 1 and 2 - page 337

Unit 3 - page 367

Technical specification 6.2.B.4 lists the responsibilities of the BFN Plant Operations Review Committee (PORC). These proposed revisions delete certain of the current responsibilities as described below.

1. Delete the consideration of an unreviewed safety questions from 6.2.B.4.c. The requirement to review proposed changes to equipment or systems having safety significance would remain.
2. Delete the phrase "on an annual basis" from 6.2.B.4.i, the review requirement for the Radiological Emergency Plan and the Industrial Security Program.
3. Delete 6.2.B.4.j, the review of employee training programs.

Justification

The current BWR Standard Technical Specifications (NUREG-0123) do not contain these specifications. We are not aware of any currently defined regulatory basis for having these requirements as a part of the technical specifications.

These requirements have been in the BFN technical specifications quite possibly since initial licensing. There may have existed at that time a regulatory requirement for these specifications. More likely, it was imposed on BFN because it was believed to have some benefit or significance. However, because there is no defined regulatory basis for these requirements, we believe their deletion is justified.

Deletion of these requirements from the duties of PORC will have no adverse effect on plant operation or nuclear safety.

These proposed changes will reduce the administrative burden on PORC.





ENCLOSURE 3  
BROWNS FERRY NUCLEAR PLANT  
PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION  
(TVA BFNP TS 205)

Description of Amendment Requirement

The proposed amendments would modify the PORC Duties and Responsibility Section of the Browns Ferry Nuclear Plant Technical Specifications to conform with Standard Technical Specifications. The changes would:

1. Delete the consideration of an "unreviewed safety question" from the requirement of PORC review of proposed changes to equipment or systems having safety significance.
2. Delete the phrase "on an annual basis" from the review requirement for the Radiological Emergency Plan and the Industrial Security Program.
3. Delete the review by PORC of the employee training programs.

Basis for Proposed No Significant Hazards Consideration Determination

The criteria for determining whether a proposed amendment involves no significant hazards consideration is provided by 10 CFR 50.92(c). That criteria is that a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The proposed revisions to the technical specifications are simply to delete current requirements from the Plant Operations Review Committee to review: any "unreviewed safety question," the employee training program, and delete reference to the interval (annual) for review of the Radiological Emergency Plan and the Industrial Security Program. As such, the proposed changes do not alter or affect in any way the plant's safety or safety-related systems. For that reason, we believe that the proposed amendments would not increase the probability or consequences of a previously analyzed accident. Likewise, we believe no new accident possibility is created.



There is no analysis or scenario which associates the above described PORC reviews, which are proposed for deletion, with a margin of safety. There is no basis on which to quantitatively measure the impact or effect of these reviews on any plant or technical specification margin of safety. We, therefore, believe that discontinuing these reviews will not cause a reduction in any margin of safety.

Based on the above, we conclude that the proposed amendments involve no significant hazards considerations.

