ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION REVISIONS
BROWNS FERRY NUCLEAR PLANT
UNIT 1, 2, AND 3
(TVA BFNP TS 201 SUPPLEMENT 1)
SECTION 6 - ADMINISTRATIVE CONTROLS

ADMINISTRATIVE CONTROLS

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

The Plant Manager has onsite responsibilities for the safe operation of the facility and shall report to the Browns Ferry Site Director. In the absence of the Plant Manager, a Plant Superintendent will assume his responsibilities.

6.2 ORGANIZATION

CORPORATE

6.2.1 The portion of TVA management which relates to the operation of the plant is shown in Figure 6.2-1.

PLANT STAFF

6.2.2 The functional organization for the operation of the plant shall be shown in Figure 6.2-2.

a. Shift manning requirements, shall as a minimum, be as described in Table 6.2.A and below.

b. A licensed senior reactor operator shall be present at the site at all times when there is fuel in the reactor.

6.2.2 (Cont.)

c. A licensed reactor operator shall be in the control room whenever there is fuel in the reactor.

d. Two licensed reactor operators shall be in the control room during any cold startups, while shutting down the reactor, and during recovery from unit trip. In addition, a person holding a senior operator license shall be in the control room for that unit whenever it is in an operational mode other than cold shutdown or refueling.

e. A Health Physics Technician* shall be present at the facility at all times when there is fuel in the reactor.

f. A person holding a senior operator license or a senior operator license limited to fuel handling, shall be present during alteration of the core to directly supervise the activity and during this time shall not be assigned other duties.

g. A site fire brigade of at least five members shall be maintained onsite at all times.* The fire brigade shall not include the Shift Engineer and the other members of the minimum shift crew necessary for safe shutdown of the unit, nor any personnel required for other essential functions during a fire emergency.

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*The Health Physics Technician and fire brigade composition may be less than the minimum requirements 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.

Table 6.2.A
Minimum Shift Crew Requirements[b]

Position	Units in Operation				Type of License
	0	1	2[d]	3	
Senior Operator[a]	1	1	1	1	SRO
Senior Operator	0	1	2	2	SRO
Licensed Operators	3	3	3	3	RO or SRO
Additional Licensed Operators[c]	0	1	2	2	RO or SRO
Assistant Unit Operators (AUO)	4	4	5	5	None
Shift Technical Advisor (STA)	0	1	1	1	None[e]
Health Physics Technician	1	1	1	1	None

Note for Table 6.2.A

a. A senior operator will be assigned responsibility for overall plant operation at all times there is fuel in any unit.

b. Except for the senior operator discussed in note "a", the shift crew composition may be one less than the minimum requirements of Table 6.2.A for a period of time not to exceed two 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 of Table 6.2.A. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

c. One of the Additional Licensed Operators must be assigned to each control room with an operating unit.

d. The number of required licensed personnel, when the operating units are controlled from a common control room, are two senior operators and four operators.

e. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and transient and accident response and analysis.

6.3 PLANT STAFF QUALIFICATIONS

Qualifications of the Browns Ferry Nuclear Plant management and operating staff shall meet the minimum acceptable levels as described in ANSI - N18.1, Selection and Training of Nuclear Power Plant Personnel, dated March 8, 1971. The qualifications of the Health Physics Supervisor will meet or exceed the minimum acceptable levels as described in Regulatory Guide 1.8, Revision 1, dated September 1975.

6.4 TRAINING

A retraining and replacement training program for station personnel shall be in accordance with ANSI - N18.1, Selection and Training of Nuclear Power Plant Personnel, dated March 8, 1971. The minimum frequency of the retraining program shall be every two years.

6.5 PLANT REVIEW AND AUDIT

6.5.1 Plant Operations Review Committee (PORC)

6.5.1.1 Function

a. The PORC shall function to advise the Plant Manager in all matters related to nuclear safety.

b. This advisory function shall be performed by the PORC acting in a formal meeting or by members acting individually without a formal meeting.

Composition

6.5.1.2 The PORC shall be composed of the:

a. Chairman:	Plant Manager or PlantSuperintendent Operations & Engineering or Plant Superintendent, Maintenance
Member:	Electrical Maintenance Group Supervisor
Member:	Mechanical Maintenance Group Supervisor
Member:	Instrument Maintenance Group Supervisor
Member:	Operations Group Supervisor
Member:	Engineering Group Supervisor
Member:	Quality Assurance Staff Supervisor
Member:	Health Physics Group Supervisor

b. All alternate chairmen and alternate members shall be appointed in writing by the PORC chairman.

MEETING FREQUENCY

6.5.1.3 The PORC shall convene in a formal meeting at least once a month and as directed by the chairman. Other PORC meetings may be requested by the chairmen or members as required.

6.5.1.4 For expedited meetings, when it is not practical to convene as a group, the chairman or alternate chairman may conduct committee business by polling the members individually (by telephone or in person) or via a serialized review.

QUORUM

6.5.1.5 The quorum necessary for the PORC to act in a formal meeting shall consist of the chairman or alternate chairman and at least five members or their alternates. Members shall be considered present if they are in telephone communication with the committee.

RESPONSIBILITIES

6.5.1.6 The PORC shall be responsible for the activities listed below. The PORC may delegate the performance of reviews, but will maintain cognizance over and responsibility for them, e.g., subcommittees.

a. Review of administrative procedures for the control of the technical and cross-disciplinary review of (1) all procedures required by specification 6.8.1.1, and changes thereto, (2) any other procedures and changes thereto determined by the Plant Manager to affect nuclear safety.

b. Review of the administrative procedures required by specification 6.8.1.1.a. and changes thereto.

c. Review of emergency operating procedures and changes thereto.

d. Review of the Radiological Emergency Plans and the implementing procedures.

e. Review of all proposed changes to the Technical Specifications.

f. Review of safety evaluation for proposed tests or experiments to be completed under the provisions of 10 CFR 50.59

g. Review of all safety evaluations for modifications to safety related structures, systems or components to verify that such actions did not constitute an unreviewed safety question as defined in 10 CFR 50.59, or requires a change to these Technical Specifications.

h. Review of reportable events, unusual events, operating anomalies, and abnormal performance of plant equipment.

i. Investigate reported or suspected incidents involving safety questions or violations of the Technical Specifications.

j. Review of unit operations to detect potential hazards to nuclear safety. Items that may be included in this review are NRC inspection reports, QA audit, NSRB audit results, American Nuclear Insurer (ANI) inspection results, and significant corrective action reports (CARs).

k. Performance of special reviews, investigations, or analysis, and report thereon as requested by the Plant Manager or the Nuclear Safety Review Board.

AUTHORITY

6.5.1.7 The PORC shall:

a. Recommend to the Plant Manager in writing, approval, or disapproval of items considered under 6.5.1.6.a through f above.

1. The recommendation shall be based on a majority vote of the PORC at a formal meeting.

2. The recommendation shall be based on a unanimous vote of the PORC when the PORC members are acting individually.

3. Each member or alternate member shall have one vote.

b. Furnish for consideration a determination in writing with regard to whether or not each item considered under 6.5.1.6.f above constitutes an unreviewed safety question.

c. Make recommendations to the Plant Manager in writing that action reviewed under 6.5.1.6.g above did not constitute an unreviewed safety question.

d. Provide written notification within 24 hours to the Site Director and the Nuclear Safety Review Board of disagreements between the PORC and the Plant Manager. However, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to specification 6.1.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting including expedited meetings that, as a minimum, document the result of all PORC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Site Director and the Nuclear Safety Review Board.

6.5.2 NUCLEAR SAFETY REVIEW BOARD

FUNCTION

6.5.2.1 The NSRB shall function to provide independent review and audit cognizance of designated activities in the areas of:

a. Nuclear power plant operations
b. Nuclear engineering
c. Chemistry and radiochemistry
d. Metallurgy
e. Instrumentation and control
f. Radiological safety
g. Mechanical and electrical engineering, and
h. Quality assurance practices

COMPOSITION

6.5.2.2 The NSRB shall be composed of at least five members, including the Chairman. Members of the NSRB may be from the Office of Nuclear Power or other TVA organizations, or external to TVA.

QUALIFICATIONS

6.5.2.3 The Chairman, members, alternate members of the NSRB shall be appointed in writing by the Manager of Nuclear Power and shall have an academic degree in engineering or a physical science field, or the equivalent; and in addition, shall have a minimum of 5 years technical experience in one or more areas given in 6.5.2.1. No more than two alternates shall participate as voting members in NSRB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized to provide expert advice as determined by the NSRB.

MEETING FREQUENCY

6.5.2.5 The NSRB shall meet at least once per six months.

QUORUM

6.5.2.6 The minimum quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these technical specifications shall consist of more than half of the NSRB membership or at least five members, whichever is greater. The quorum shall include the Chairman or his appointed alternate and the NSRB members including appointed alternate members meeting the requirements of 6.5.2.3. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The NSRB shall review:

a. The safety evaluations for: (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.

b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.

c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.

d. Proposed changes to Technical Specifications or this Operating License.

e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.

f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.

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; and

i. Reports and meeting minutes of the PORC.

AUDITS

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

a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.

b. The performance, training and qualifications of the entire plant staff at least once per 12 months.

c. The results of actions taken to correct deficiencies occurring in site 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 Part 50, at least once per 24 months.

e. The Site Radiological Emergency Plan and implementing procedures at least once every 12 months.

f. The Plant Physical Security Plan and implementing procedures at least once every 12 months.

g. Any other area of site operation considered appropriate by the NSRB or the Manager of Nuclear Power.

h. The fire protection programmatic controls including the 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 license 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.

k. The Radiological Environmental Monitoring program and the results thereof at least once per 12 months.

l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 at least once every 12 months.

m. The performance of activities required by the Safeguards Contingency Plan to meet the criteria of 10 CFR 73.40(d) at least once every 12 months.

AUTHORITY

6.5.2.9 The NSRB shall report to and advise the Manager of Nuclear Power on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Reports of activities shall be prepared, approved, and distributed as indicated below:

a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Manager of Nuclear Power within 14 days following each meeting.

b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Manager of Nuclear Power within 14 days following completion of the review.

c. Audit reports encompassed by Specification 6.5.2.8 above, shall be forwarded to the Manager of Nuclear Power and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.5.3 TECHNICAL REVIEW AND APPROVAL OF PROCEDURES

ACTIVITIES

6.5.3.1 Procedures required by Technical Specification 6.8.1.1 and other procedures which affect plant nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared, reviewed and approved. Each procedure or procedure change shall be reviewed by an individual other than the preparer. The reviewer may be from the same organization or from a different organization. Procedures other than Site Director Standard Practices will be approved by the responsible group/section supervisor, or applicable plant superintendent.

6.5.3.2 Proposed changes or modifications to plant nuclear safety-related structures, systems and components shall be reviewed as designated by the Plant Manager. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group which designed the modification. Proposed modifications to plant nuclear safety-related structures, systems and components shall be approved by the Plant Manager, prior to implementation.

6.5.3.3 Individuals responsible for reviews performed in accordance with 6.5.3.1 shall be members of the site supervisory staff previously designated by the Plant Manager. Each such review shall include a determination of whether or not additional, cross-disciplinary, review is necessary. If deemed necessary, such review shall be performed by review personnel of the appropriate discipline.

6.5.3.4 The Plant Manager shall approve all administrative procedures requiring PORC review prior to implementation.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the PORC and the results of this review shall be submitted to the NSRB and the Site Director.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Manager of Nuclear Power and the NSRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence.

c. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB and the Manager of Nuclear Power within 14 days of the violation.

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES/INSTRUCTIONS AND PROGRAMS

6.8.1 PROCEDURES

6.8.1.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. Limitations on the amount of overtime worked by individuals performing safety related functions in accordance with NRC Policy statement on working hours (Generic Letter No. 82-12).

c. Surveillance and test activities of safety related equipment.

d. Security plan implementation.

e. Emergency plan implementation.

f. Fire Protection Program implementation.

6.8.1.2 Each administrative procedure required by Section 6.8.1.1.a. shall be reviewed by PORC and all other procedures required by Section 6.8.1.1.a. shall be reviewed in accordance with Section 6.5.3.

6.8.1.3 Temporary changes to procedures of Specification 6.8.1.1 may be made provided:

a. The intent of the original procedure is not altered;

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator License on the unit affected;

c. The change is documented, reviewed by the PORC and approved by the Plant Manager within 14 days of implementation, for changes in administrative procedures requiring PORC review.

d. The change is documented, reviewed per specification 6.5.3, and approved by the responsible group section supervisor within 14 days of implementation, for changes to procedures other than administrative procedures.

DRILLS

6.8.2 Drills on actions to be taken under emergency conditions involving release of radioactivity are specified in the Radiological Emergency Plan and shall be conducted annually. Annual drills shall also be conducted on the actions to be taken following failures of safety related systems or components.

RADIATION CONTROL PROCEDURES

6.8.3 Radiation Control Procedures shall be maintained and made available to all station personnel. These procedures shall show permissible radiation exposure and shall be consistent

with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20 except in lieu of the "control device" or "alarm signal" required by paragraph 20.203 (c) of 10 CFR 20.

6.8.3.1 Each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiological Work Permit.* Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiological Work Permit.

6.8.3.2 Each high radiation area in which the intensity of radiation is greater than 1,000 mrem/hr shall be subject to the provisions of (1) above; and, in addition, access to the source and/or area

shall be secured by lock(s). The key(s) shall be under the administrative control of the shift engineer. In the case of a high radiation area established for a period of 30 days or less, direct surveillance to prevent unauthorized entry may be substituted for permanent access control.

*Health Physics personnel, or personnel escorted by Health Physics personnel, in accordance with approved emergency procedures, shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Director of the Regional Office of NRC, unless otherwise noted.

6.9.1.1 STARTUP REPORT

a. A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic

performance of the plant. The report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

b. Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

6.9.1.2 ANNUAL OPERATING REPORT*

a. 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 totaling 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.

b. Any mainsteam relief valve that opens in response to reaching its setpoint or due to operator action to control reactor pressure shall be reported.

6.9.1.3 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 Regional Office, to be submitted no later than the fifteenth of each month following the calendar month covered by the report. A narrative summary of operating experience shall be submitted in the above schedule.

6.9.1.4 REPORTABLE EVENTS

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

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*A single submittal may be made for a multiple unit station.

**This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.9.1.5 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.

6.9.1.6 SOURCE TESTS

Results of required leak tests performed on sources if the tests reveal the presence of 0.005 microcurie or more of removable contamination.

*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

6.9.2 Special Reports

Reports on the following areas shall be submitted in writing to the Director of Regional Office of Inspection and Enforcement:

1.	Fatigue Usage	6.10.1.q	Annual Operating Report
2.	Relief Valve Tailpipe	3.2.F	Within 30 days after inoperability of thermocouple and acoustic monitor on one valve.
3.	Seismic Instrumentation Inoperability	3.2.J.3	Within 10 days after 30 days of inoperability.
4.	Meteorological Monitoring Instrumentation Inoperability	3.2.I.2	Within 10 days after 7 days of inoperability.
5.	Primary Containment Integrated Leak Rate Testing	4.7.A.2	Within 90 days of completion of each test.

6. Data shall be retrieved from all seismic instruments actuated during a seismic event and analyzed to determine the magnitude of the vibratory ground motion. A Special

	Report shall be submitted within 10 days after the event describing the magnitude, frequency spectrum, and resultant effect upon plant features important to safety.		
7.	Secondary Containment Leak Rate Testing*	4.7.C.	Within 90 days of completion of each test.

*Each integrated leak rate test of the secondary containment shall be the subject of a summary technical report. This report should include data on the wind speed, wind direction, outside and inside temperatures during the test, concurrent reactor building pressure, and emergency ventilation flow rate. The report shall also include analyses and interpretations of those data which demonstrate compliance with the specified leak rate limits.

6.10 STATION OPERATING RECORDS AND RETENTION

6.10.1 Records and/or logs shall be kept in a manner convenient for review as indicated below:

a. All normal plant operation including such items as power level, fuel exposure, and shutdowns

b. Principal maintenance activities

c. Reportable Events

d. Checks, inspections, tests, and calibrations of components and systems, including such diverse items as source leakage

e. Reviews of changes made to the procedures or equipment or reviews of tests and experiments to comply with 10 CFR 50.59

f. Radioactive shipments

g. Test results in units of microcuries for leak tests performed pursuant to Specification 3.8.D

h. Record of annual physical inventory verifying accountability of sources on record

i. Gaseous and liquid radioactive waste released to the environs

j. Offsite environmental monitoring surveys

k. Fuel inventories and transfers

l. Plant radiation and contamination surveys

m. Radiation exposures for all plant personnel

n. Updated, corrected, and as-built drawings of the plant

o. Reactor coolant system inservice inspection

p. Minutes of meetings of the NSRB.

q. Design fatigue usage evaluation

Monitoring and recording requirements below will be met for various portions of the reactor coolant pressure boundary (RCPB) for which detailed fatigue usage evaluation per the ASME Boiler and Pressure Vessel Code Section III was performed for the conditions defined in the design specification. In this plant, the applicable codes require fatigue usage evaluation for the reactor pressure vessel only. The locations to be monitored shall be:

1. The feedwater nozzles

2. The shell at or near the waterline

3. The flange studs

Transients that occur during plant operations will be reviewed and a cumulative fatigue usage factor determined.

For transients which are more severe than the transients evaluated in the stress report, code fatigue usage calculations will be made and tabulated separately.

In the annual operating report, the fatigue usage factor determined for the transients defined above shall be added and a cumulative fatigue usage factor to date shall be reported. When the cumulative usage factor reaches a value of 1.0, an inservice inspection shall be included for the specific location at the next scheduled inspection (3-1/3-year interval) period and 3-1/3-year intervals thereafter, and a subsequent evaluation performed in accordance with the rules of ASME Section XI Code if any flaw indications are detected. The results of the evaluation shall be submitted in a Special Report for review by the Commission.

6.10.2 Except where covered by applicable regulations, items a through h above shall be retained for a period of at least 5 years and items i through q shall be retained for the life of the plant. A complete inventory of radioactive materials in possession shall be maintained current at all times.

1. See paragraph N-415.2, ASME Section III, 1965 Edition.

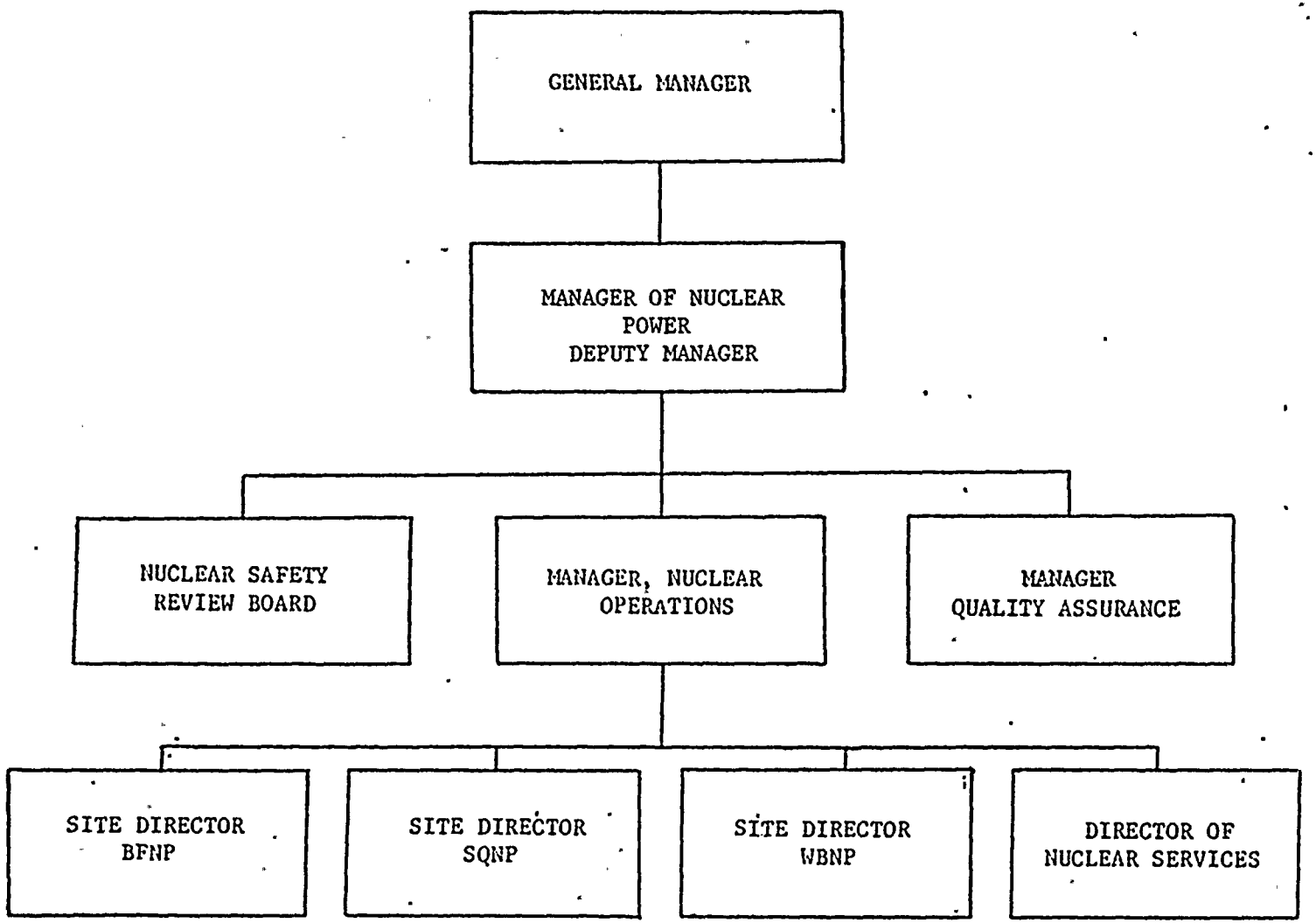

FIGURE 6.2-1

OFFSITE ORGANIZATION FOR FACILITY MANAGEMENT AND TECHNICAL SUPPORT

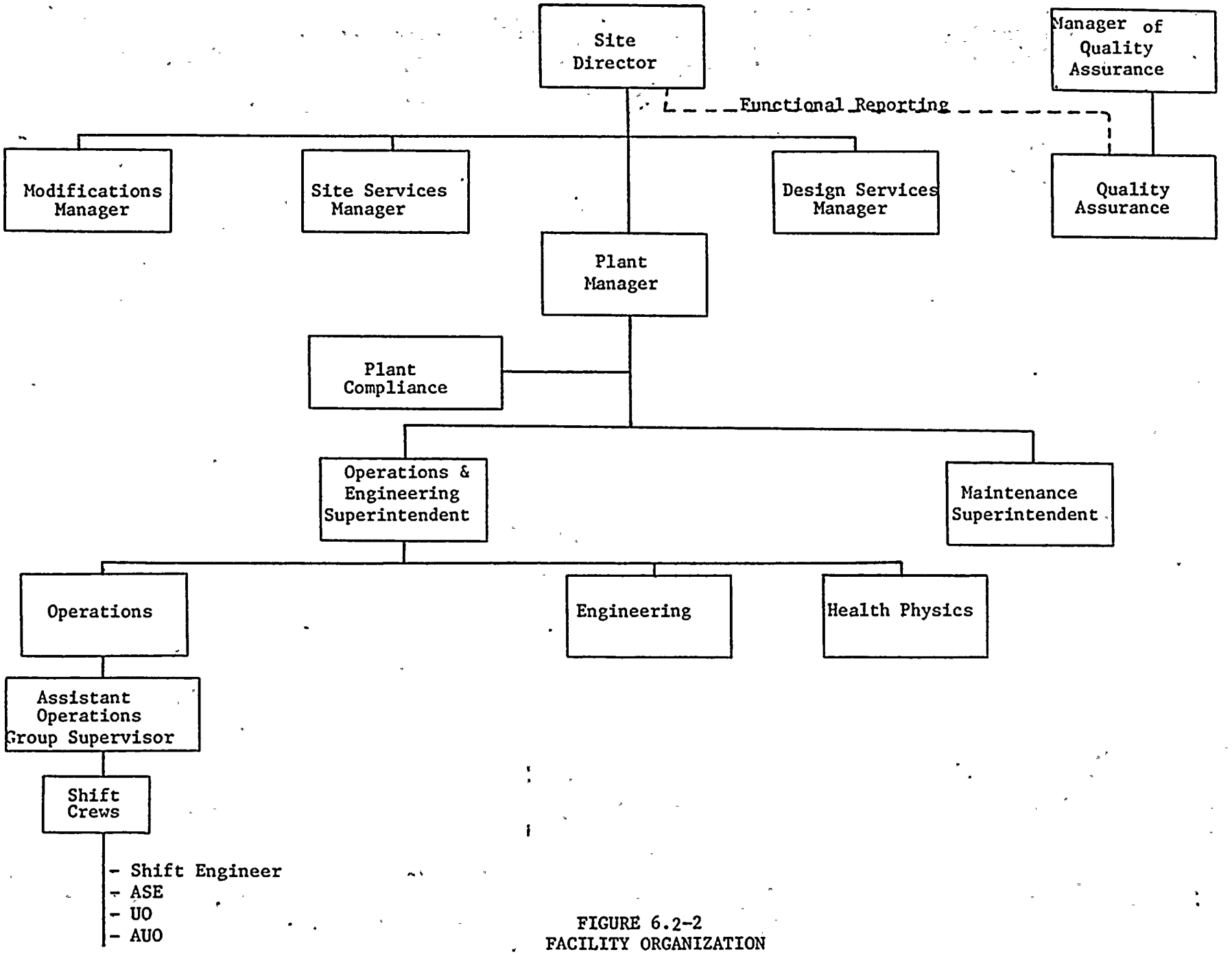

FIGURE 6.2-2
FACILITY ORGANIZATION

PROPOSED CHANGES
UNIT 1

LIST OF TABLES (Cont'd)

LIST OF ILLUSTRATIONS

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.2.H Flood Protection The unit shall be shutdown and placed in the cold condition when Wheeler Reservoir lake stage rises to a level such that water from the reservoir begins to run across the pumping station deck at elevation 565. Requirements for instrumentation that monitors the reservoir level is given in Table 3.2.H.	4.2.H Flood Protection Surveillance shall be performed on the instrumentation that monitors the reservoir level as indicated in Table 4.2.H.
3.2.I Meteorological Monitoring Instrumentation The meteorological monitoring instrumentation listed in table 3.2.I shall be operable at all times. 1. With the number of operable meteorological monitoring channels less than required by table 3.2.I, restore the inoperable channel(s) to operable status within 7 days. 2. With one or more of the meteorological monitoring channels inoperable for more than 7 days, prepare and submit a Special Report to the Commission, pursuant to specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the system to operable status.	4.2.I Meteorological Monitoring Instrumentation Each meteorological monitoring instrument channel shall be demonstrated operable by the performance of the CHANNEL CHECK at least once per 24 hours and the CHANNEL CALIBRATION at least once each 6 months.

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.2.J Seismic Monitoring Instrumentation	4.2.J Seismic Monitoring Instrumentation
1. The seismic monitoring instruments listed in table 3.2.J shall be operable at all times.	1. Each of the seismic monitoring instruments shall be demonstrated operable by performance of tests at the frequencies listed in table 4.2.J.
2. With the number of seismic monitoring instruments less than the number listed in table 3.2.J, restore the inoperable instrument(s) to operable status within 30 days.	2. Data shall be retrieved from all seismic instruments actuated during a seismic event and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be submitted to the Commission pursuant to specification 6.9.2 within 10 days describing the magnitude, frequency spectrum, and resultant effect upon plant features important to safety.
3. With one or more of the instruments listed in table 3.2.J inoperable for more than 30 days, submit a Special Report to the Commission pursuant to specification 6.9.2 within the next 10 days describing the cause of the malfunction and plans for restoring the instruments to operable status.	

PROPOSED CHANGES
UNIT 2

LIST OF TABLES (Cont'd)

LIST OF ILLUSTRATIONS

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.2.H Flood Protection The unit shall be shutdown and placed in the cold condition when Wheeler Reservoir lake stage rises to a level such that water from the reservoir begins to run across the pumping station deck at elevation 565. Requirements for instrumentation that monitors the reservoir level is given in Table 3.2.H.	4.2.H Flood Protection Surveillance shall be performed on the instrumentation that monitors the reservoir level as indicated in Table 4.2.H.
3.2.I Meteorological Monitoring Instrumentation The meteorological monitoring instrumentation listed in table 3.2.I shall be operable at all times. 1. With the number of operable meteorological monitoring channels less than required by table 3.2.I, restore the inoperable channel(s) to operable status within 7 days. 2. With one or more of the meteorological monitoring channels inoperable for more than 7 days, prepare and submit a Special Report to the Commission, pursuant to specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the system to operable status.	4.2.I Meteorological Monitoring Instrumentation Each meteorological monitoring instrument channel shall be demonstrated operable by the performance of the CHANNEL CHECK at least once per 24 hours and the CHANNEL CALIBRATION at least once each 6 months.

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.2.J Seismic Monitoring Instrumentation	4.2.J Seismic Monitoring Instrumentation
1. The seismic monitoring instruments listed in table 3.2.J shall be operable at all times.	1. Each of the seismic monitoring instruments shall be demonstrated operable by performance of tests at the frequencies listed in table 4.2.J.
2. With the number of seismic monitoring instruments less than the number listed in table 3.2.J, restore the inoperable instrument(s) to operable status within 30 days.	2. Data shall be retrieved from all seismic instruments actuated during a seismic event and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be submitted to the Commission pursuant to specification 6.9.2 within 10 days describing the magnitude, frequency spectrum, and resultant effect upon plant features important to safety.
3. With one or more of the instruments listed in table 3.2.J inoperable for more than 30 days, submit a Special Report to the Commission pursuant to specification 6.9.2 within the next 10 days describing the cause of the malfunction and plans for restoring the instruments to operable status.	

PROPOSED CHANGES
UNIT 3

LIST OF ILLUSTRATIONS

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.2 PROTECTIVE INSTRUMENTATION	4.2 PROTECTIVE INSTRUMENTATION
2. With one or more of the meteorological monitoring channels inoperable for more than 7 days, prepare and submit a Special Report to the Commission, pursuant to specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the system to operable status.	

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.2 PROTECTIVE INSTRUMENTATION	4.2 PROTECTIVE INSTRUMENTATION
J. Seismic Monitoring Instrumentation	J. Seismic Monitoring Instrumentation
1. The seismic monitoring instruments listed in Table 3.2.J shall be operable at all times.	1. Each of the seismic monitoring instruments shall be demonstrated operable by performance of tests at the frequencies listed in Table 4.2.J.
2. With the number of seismic monitoring instruments less than the number listed in Table 3.2.J, restore the inoperable instrument(s) to operable status within 30 days.	2. Data shall be retrieved from all seismic instruments actuated during a seismic event and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be submitted to the Commission pursuant to specification 6.9.2 within 10 days describing the magnitude, frequency spectrum, and resultant effect upon plant features important to safety.
3. With one or more of the instruments listed in Table 3.2.J inoperable for more than 30 days, submit a Special Report to the Commission pursuant to specification 6.9.2 within the next 10 days describing the cause of the malfunction and plans for restoring the instruments to operable status.	

ENCLOSURE 2
DESCRIPTION AND JUSTIFICATION
TVA BFNP TS 201 SUPPLEMENT 1

Description of Changes

(1) The amendment will adopt the Standard Technical Specifications (STS) method for page numbering and format in the Administrative Controls section. Pages 332 thru 364 (unit 1), 333 thru 364 (unit 2) and 362 thru 394 (unit 3) are renumbered 6-1 thru 6-30.

(2) The Table of Contents pages, (iv, v, vii, and viii) for each unit will be revised to reflect the other changes in this amendment. References to section 6 are also revised on pages 53 and 54 of units 1 and 2 and on pages 55 and 56 of unit 3.

(3) Pages 6-2 and 6-3:

(a) The note requiring the Shift Technical Advisor to be present at all times has been deleted since this requirement is sufficiently covered in Table 6.2.A.

(b) The note (#6) which required either the plant manager or a plant superintendent to have SRO training and the operations supervisor or the assistant operations supervisor to have an SRO license has also been deleted since the amended staffing requirements meet the guidance provided by NRC in STS and 10 CFR 50.54(m).

(c) Per NRC comments a statement has been included that says, "In addition, a person holding a senior operator license shall be in the control room for that unit whenever it is in an operational mode other than cold shutdown or refueling."

(d) Also per NRC comment the requirement for a senior licensed operator in respect to fuel handling has been clarified.

(e) A third comment by NRC is addressed by the addition of the STS requirement to maintain a site fire brigade. This change also includes the addition of the STS note regarding the minimum requirements for the site fire brigade and health physics technician.

(f) Finally the Minimum Shift Crew Requirements (Table 6.2.A) have been revised to meet that described in 10 CFR 50.54(m).

(4) Pages 6-4 thru 6-9 describing the Plant Operations Review Committee and pages 6-14 thru 6-18 describing technical review and approval of procedures have been extensively revised. The revisions to the current TS section 6.2.B (new section 6.5.1) changes the format of this section to allow PORC to function as a body or as individuals collectively when the vote is unanimous, and thru the use of subcommittees. It also changes PORC review responsibilities to require it to focus on the safety related issues, the emergency operating instructions and the administrative procedures that control the technical and cross-disciplinary review of those written procedures covering safety related activities.

The revision to the current TS section 6.3.A (new section 6.8.1) more clearly delineates, by reference to Appendix A of Regulatory Guide 1.33, those procedures which are required to be established, implemented, and maintained for operation of the plant and deletes from PORC the review responsibility for those corporate site-level procedures issued by the site director.

The revision to the current TS section 6.3.B (new section 6.5.3) establishes the required technical and cross-disciplinary review and approval to support the changes in PORC review responsibilities. It establishes plant manager control of the required revisions of proposed changes or modifications to nuclear safety related instructions, systems or components at BFN. It assigns the required technical and cross-disciplinary review responsibilities to members of the site supervisory staff designated by the plant manager and requires the responsible individuals to consider whether or not cross-disciplinary review is necessary. In addition, it specifies those procedures requiring plant manager approval prior to implementation.

Also, the NRC comment that PORC distribute written minutes of each PORC meeting to the Site Director and the Nuclear Safety Review Board (NSRB) has been incorporated.

(5) Pages 6-9 thru 6-14 describe the NSRB. The change in TVA BFN TS 201 to replace the NSRB with the Nuclear Safety Staff (NSS) has been withdrawn.

(6) Pages 6-15 and 6-16 describing actions to be taken in the event of a Reportable Event or a Safety Limit Violation has been revised to utilize the guidance provided by NRC in STS. This change also satisfies an NRC comment on TS 201.

(7) Page 6-19 contains a minor change to show that BFN has changed the title of the Special Work Permit to the Radiological Work Permit.

(8) Pages 6-20 thru 6-25 discuss reporting requirements.

(a) Footnotes 2 and 3 of the current TS section 6.7, which defined the terms, "forced reduction in power" and "forced outage" are deleted by this amendment since they are not referenced anywhere in TS.

(b) The notes 1 and 2 are moved and properly referenced by the Annual Operating Report requirement and the Radioactive Effluent Release Report requirement as shown by NRC guidance provided in the STS.

(c) The reference to safety relief valves in the current TS on the Annual Operating Report has been changed to properly reference only relief valves since "safety valves" were deleted from units 1, 2, and 3 TS by amendments 92, 85, and 51 respectively.

(d) The requirement for the Monthly Operating Report has been changed to allow 15 days for submission to NRC instead of the current requirement of 10 days. This extension of 5 days is consistent with the guidance provided in STS.

(9) Pages 6-27 and 6-28 have been revised to slightly modify the words of the current TS section 6.6.A.17 (new section 6.10.1.0) to reflect the revised format and the current TS section 6.6.A.18 has been deleted since it was solely in reference to a paragraph 6.10 which was previously deleted by amendments 79, 75, and 48 for units 1, 2, and 3 respectively.

(10) Pages 6-29 and 6-30 are the revised figures for Offsite Organization and Facility Organization. The "Manager of Nuclear Power" shown on figure 6.2-1 replaced the position of "Manager of Power and Engineering" shown in this figure submitted by TS 201, dated September 27, 1984. TVA request for technical specification change TS 174 and TS 174 Supplement 1, which was superseded by TS 201, this position was shown as the Director, Division of Nuclear Power.

This figure also shows the Nuclear Safety Review Board instead of the Nuclear Safety Staff included in TS 201. The figure shows a change in the structure of Quality Assurance. It also shows the position of Manager, Nuclear Operations..

Reason for Change

(1) and (2) Changing the TS format should make the Administrative Controls section easier to follow due to the more logical order in which each section appears and the better indexing and improved section headings should make finding needed information quicker and easier. The standard page numbering system will allow all units to have identical pages, thereby reducing administrative burden.

(3) (a) Current TS are redundant and overly restrictive by requiring the STA to be onsite at all times. (b) Note 6 in current TS does not correspond to any requirement in STS and since this section is being revised to comply with standards, this note is being deleted. (c thru f) These new requirements are in response to NRC comments and to comply with STS and 10 CFR 50.54(m).

(4) A very large administrative burden to PORC has resulted from the current interpretation of review requirements for administrative procedures and procedural changes. The proposed changes to technical specifications will allow the use of individual reviewers to reduce this burden. The current requirements have reduced the time available for PORC to review and focus on significant safety issues, and limits supervisory time available for verifying that operating activities are conducted safely and in accordance with administrative controls. Adding the distribution of PORC meeting minutes is consistent with STS and in response to an NRC comment on TS 201.

(5) The proposed reorganization of the NSRB to form the NSS has been cancelled.

(6) Adopting STS language for actions to be taken in the event of a safety limit violation or reportable event will clarify these sections and satisfy an NRC comment on TS 201.

(7) Changing to a "Radiological Work Permit" will make BFN consistent with other TVA nuclear plants.

(8) (a) Deleting notes that are not referenced in the current TS and are not in STS will clarify the actual requirements by removing unused words. (b) Moving notes to the area where they are to be referenced and properly noting the reference will clarify these requirements. (c) Removing this reference to safety valves is correcting an error and does not actually change the requirement. (d) Allowing 15 days to submit the monthly report will provide needed additional time for its preparation.

(9) These changes are to improve the format and clarity of the Administrative Controls section.

(10) These organizational charts are to reflect the TVA organization currently in effect.

Comment No. 1 from D. B. Vassallo's June 27, 1985 letter to H. G. Parris was a recommendation that the offsite organization chart be expanded to show the function block of Manager-Radiological Health reporting to the Director of Nuclear Services. We do not believe that it would be beneficial to expand the offsite organization chart as recommended. Our position is based partly on the fact that Sequoyah's latest administrative technical specification request did not include this block on the offsite organization chart. Furthermore, expanding the chart would produce additional detail which would be subject to change. Simply adding this block to the chart will not improve nuclear safety.

Justification for Changes

TVA is a corporate agency of the Federal Government whose major policies, programs, and organizations are determined by a full-time, three member Board of Directors. Members of the Board are appointed by the President and

confirmed by the Senate for nine-year terms. The staffs of Browns Ferry Nuclear Plant within the Office of Nuclear Power is responsible for operating and maintaining TVA's Browns Ferry Nuclear Plant. The changes contained in this amendment request deal specifically and solely with the administrative controls required by TS.

Changing the Administrative Controls section to standard format with the standard page numbering system, deleting unnecessary notes, deleting references to previously deleted requirements, adopting STS terminology, adding new minimum shift crew requirements, and updating the description of the TVA organization are all within the guidance provided by NRC in STS and should result in increased clarity and usefulness and therefore, increased safety.

The changes to the description of PORC and technical review are consistent with the regulatory position of Regulatory Guide 1.33, revision 2, February 1978, and requires decisions affecting safety to be made at the proper level of responsibility and with the necessary technical advice and review. They do not degrade the effectiveness of the independent technical review. Rather, these changes reinforce the technical and cross-disciplinary review and approval of the written procedures and permit PORC to focus its attention on the significant safety issues and the administrative controls important to the safe operation of the plant consistent with Regulatory Guide 1.33, revision 2. The changes that reduce PORC review of procedures and modifications are consistent with recent NRC approved TS such as NUREG 1042.

ENCLOSURE 3
Determination of No Significant Hazards Consideration

Description of Amendment Request

The proposed amendment would revise the technical specifications (TS) of Browns Ferry Nuclear Plant units 1, 2, and 3 to provide various improvements and clarifications to the Administrative Controls section. The changes include:

(1) Revise section 6, Administrative Controls, to incorporate the format of Standard Technical Specifications (STS). This includes the use of the STS page numbering system, revised index/table of contents and relocation of several requirements, revising all the references within TS to sections in section 6, incorporating STS language for actions to be taken in the event of a safety limit violation or reportable event, changing the title of the Special Work Permit (SWP) to the Radiological Work Permit (RWP), and allowing 15 days to submit the monthly report to NRC as is allowed in STS.

(2) Revise the minimum plant staffing requirements to reflect the guidance of STS and 10 CFR 50.54(m). This includes deletion of the note requiring that the Shift Technical Advisor be onsite at all times, deletion of the note requiring senior operator license (SRO) training for managers, adding a note that requires an SRO to be in the control room of a unit whenever it is in an operational mode other than cold shutdown or refueling, clarifying the requirement for an SRO to directly supervise fuel handling, addition of requirements for the site fire brigade and the STS note regarding the minimum requirements for the fire brigade and health physics technician, and finally to revise the table for minimum shift crew requirements to reflect STS and 10 CFR 50.54(m).

(3) Organizational changes within TVA have resulted in revisions to the offsite and facility organization charts.

(4) Deletion of unnecessary and/or obsolete notes and requirements. Two footnotes at the end of the Reporting Requirements section which defined the terms, "forced outage" and "forced reduction in power" are deleted by this amendment since they are not referenced anywhere in these TS or in STS. Two other notes which were unreferenced at the end of this section were moved to the proper locations and referenced similar to STS. The requirement for the Annual Operating Report specifies that operation of the "safety/relief valves" should be included in the report. However, "safety valves" were deleted from the TS by previous amendments, therefore, this reference is being changed to only "relief valves". Similarly the amendment will delete a requirement to maintain records "which are covered under the provisions of paragraph 6.10," since paragraph 6.10 was deleted by previous amendments.

(5) The section that describes the Plant Operations Review Committee (PORC) has been revised to reflect a new emphasis on matters that relate to nuclear safety. The PORC membership and meeting requirements have been more clearly defined and the responsibilities revised to reflect the new emphasis and the proposed change in the technical review of modifications and procedures. The PORC section is also revised to reflect the new TVA organization and requirements of STS.

(6) The technical review and approval of procedures and proposed modifications has been changed to incorporate the use of members of the site supervisory staff designated by the plant manager to perform the required technical and cross-disciplinary review responsibilities. The procedures section has been revised to more clearly delineate those procedures which are required to be established, implemented, and maintained by referencing Appendix A of Regulatory Guide 1.33.

Basis for Proposed No Significant Hazards Consideration Determination

The Commission has provided guidance for the application of criteria for no significant hazards consideration determination by providing examples of amendments that are considered not likely to involve significant hazards considerations (48 FR 14870). These examples include: "(i) - A purely administrative change to technical specifications: for example a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. (vi) - A change which either may result in some increase to the probability or consequences of a previously analyzed accident or reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan (SRP): For example, a change resulting from the application of a small refinement of a previously-used calculational model or design method. (vii) - A change to make a license conform to changes in the regulations where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

The proposed amendments concerning the adoption of STS format, organizational changes, and deletion of unnecessary and/or obsolete notes and requirements, (items 1, 3, and 4) are administrative in nature and are therefore encompassed by example (i). The changes proposed for the Minimum Plant Staffing, PORC responsibilities, and the technical review and approval of procedures and modifications, (item 2, 5, and 6) are encompassed by example (vi) in that the revisions reflect the requirements established in the STS (NUREG-0123, Revision 3) as endorsed by chapter 16 of the Standard Review Plan and other more recent TS issued by the NRC, for example NUREG 1042. They are also encompassed by examples (i) and (vii) in that they are administrative programs and are partially the result of new regulations.

The Commission has also provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92.(c). A proposed amendment to an operating license for a facility involves no significant hazards consideration 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 changes will not significantly increase the probability or consequences of an accident previously evaluated or create the possibility of a new or different kind of accident from any accident previously evaluated because no operability or surveillance requirements for systems, structures or components used to terminate or mitigate accidents would be reduced and no equipment changes are involved.

The proposed changes will not involve a significant reduction in a margin of safety since the changes are administrative in nature and conform to NRC guidance in STS and/or recently issued TS and for the same reasons as stated above.

Since the application for amendment involves proposed changes that are encompassed by the criteria for which no significant hazards consideration exists and are encompassed by the above examples, TVA proposes to determine that the proposed amendments do not involve a significant hazards consideration.