

3.6/4.6 PRIMARY SYSTEM BOUNDARY

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

3.6.C. Coolant Leakage

1. a. Any time irradiated fuel is in the reactor vessel and reactor coolant temperature is above 212°F, reactor coolant leakage into the primary containment from unidentified sources shall not exceed 5 gpm. In addition, the total reactor coolant system leakage into the primary containment shall not exceed 25 gpm.
- b. Anytime the reactor is in RUN mode, reactor coolant leakage into the primary containment from unidentified sources shall not increase by more than 2 gpm averaged over any 24-hour period in which the reactor is in the RUN mode except as defined in 3.6.C.1.c below.
- c. During the first 24 hours in the RUN mode following STARTUP, an increase in reactor coolant leakage into the primary containment of >2 gpm is acceptable as long as the requirements of 3.6.C.1.a are met.

4.6.C. Coolant Leakage

1. Reactor coolant system leakage shall be checked by the sump and air sampling system and recorded at least once per 4 hours.

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### 3.6/4.6 PRIMARY SYSTEM BOUNDARY

#### LIMITING CONDITIONS FOR OPERATION

##### 3.6.C Coolant Leakage

2. Both the sump and air sampling systems shall be OPERABLE during reactor power operation. From and after the date that one of these systems is made or found to be INOPERABLE for any reason, reactor power operation is permissible only during the succeeding 24 hours for the sump system or 72 hours for the air sampling system.

The air sampling system may be removed from service for a period of 4 hours for calibration, function testing, and maintenance without providing a temporary monitor.

3. If the condition in 1 or 2 above cannot be met, an orderly shutdown shall be initiated and the reactor shall be shutdown in the Cold Condition within 24 hours.

##### 3.6.D. Relief Valves

1. When more than one relief valves are known to be failed, an orderly shutdown shall be initiated and the reactor depressurized to less than 105 psig within 24 hours.

#### SURVEILLANCE REQUIREMENTS

##### 4.6.C Coolant Leakage

2. With the air sampling system INOPERABLE, grab samples shall be obtained and analyzed at least once every 24 hours.

##### 4.6.D. Relief Valves

1. Approximately one-half of all relief valves shall be bench-checked or replaced with a bench-checked valve each operating cycle. All 13 valves will have been checked or replaced upon the completion of every second cycle.
2. Once during each operating cycle, each relief valve shall be manually opened until thermocouples and acoustic monitors downstream of the valve indicate steam is flowing from the valve.



ENCLOSURE 2

DESCRIPTION AND JUSTIFICATION  
BROWNS FERRY NUCLEAR PLANT (BFN)  
UNITS 1, 2, AND 3

DESCRIPTION OF CHANGE

Section 4.6.C.1, "Coolant Leakage," is being changed to require reactor coolant system leakage to be checked by the sump and air sampling system and recorded at least once every four hours instead of once every eight hours. Additionally the corresponding Limiting Condition for Operation (LCO) 3.6.C.1.b is being changed to delete the last sentence which is actually a Surveillance Requirement (SR) and redundant to SR 4.6.C.1.

LCO 3.6.C.2 is being changed to allow reactor power operation to continue only during the succeeding 24 hours whenever the drywell sump system is found to be inoperable. The current technical specifications allow 72 hours of continued operation.

REASON FOR CHANGE

This proposed change is in response to an NRC request dated March 26, 1986, from Marshall Grotenhuis to S. A. White, concerning drywell leakage monitoring and to clarify the technical specifications by removing the SR from the LCO.

JUSTIFICATION FOR CHANGE

The proposed changes will not decrease the margin of safety since the result is that a surveillance interval is shortened and the allowed outage time for the drywell sump system is decreased. The changes do not allow any equipment modifications or new operational conditions. Furthermore, these technical specifications changes will meet the guidelines in Generic Letter 84-11, "Stainless Steel Piping Reinspection," to improve sump monitoring system requirements.

For the reasons stated above, TVA has concluded that none of these proposed TS changes will reduce the margin of nuclear safety.

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ENCLOSURE 3

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION  
BROWNS FERRY NUCLEAR PLANT  
UNITS 1, 2, AND 3

DESCRIPTION OF AMENDMENT REQUEST

The proposed amendment would change the technical specifications of BFN units 1, 2, and 3 to reflect the guidelines contained in NRC Generic Letter 84-11, "Stainless Steel Piping Reinspection," April 19, 1984, which specified more restrictive leakage monitoring limits. Specifically the amendment would require drywell leakage measurement and recording every four hours instead of the current eight-hour interval, and reduce the allowable out of service time (AOT) from 72 hours to 24 hours for the sump leakage monitoring system. The amendment would also delete a redundant surveillance requirement which is stated in the limiting condition for operation.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission has 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 of operation of the facility in accordance with 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.

1. This amendment will not increase the probability or consequences of an accident previously evaluated since the AOT for the sump leakage monitoring system is decreased and the surveillance interval is also decreased. The deletion of the redundant surveillance requirement, incorrectly made part of the LCO, will not affect any technical specification requirements.
2. This amendment will not eliminate or modify any protective functions nor permit any new operational conditions and, therefore, does not create the possibility of a new or different kind of accident.
3. This amendment will not result in a significant reduction in a margin of safety for the reasons given above and because the changes reflect the guidance of NRC Generic Letter 84-11.

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