ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATIONS REVISIONS

BROWNS FERRY NUCLEAR PLANT

UNITS 1, 2, AND 3

(TVA BFN TS 225)

2. When a system, subsystem, train, component, or device is determined to be inoperable solely because its onsite power source is inoperable, or solely because its offsite power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable Limiting Condition For Operation, provided:

(1) its corresponding offsite or diesel power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are operable, or likewise satisfy these requirements. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in at least Hot Standby within 6 hours, and in at least Cold Shutdown within the following 30 hours. This definition is not applicable in Cold Shutdown or Refueling. This provision describes what additional conditions must be satisfied to permit operation to continue consistent with the specifications for power sources, when an offsite or onsite power source is not operable. It specifically prohibits operation when one division is inoperable because its offsite or diesel power source is inoperable and a system, subsystem, train, component, or device in another division is inoperable for another reason. This provision permits the requirements associated with individual systems, subsystems, trains, components, or devices to be consistent with the requirements of the associated electrical power source. It allows operation to be governed by the time limit of the requirements associated with the Limiting Condition For Operation for the offsite or diesel power source, not the individual requirements for each system, subsystem, train, component, or device that is determined to be inoperable solely because of the inoperability of its offsite or diesel power source.

D. Deleted

E. Operable - Operability - A system, subsystem, train, component, or device shall be operable or have operability when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

F. Operating - Operating means that a system or component is performing its intended functions in its required manner.

G. Immediate - Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action.

ENCLOSURE 2
DESCRIPTION AND JUSTIFICATION
BROWNS FERRY NUCLEAR PLANT (BFN)

Description of Change

Definition 1.0.C.2 for units 1, 2, and 3 is changed by adding the word "definition" and by deleting the phrase "if the unit is already" so that the sentence beginning on the thirteenth line of BFN definition 1.0.C.2 reads, "This definition is not applicable in Cold Shutdown or Refueling."

Reason for Change

This change will clarify the applicability of definition 1.0.C.2 so that the definition will not be erroneously applied while in Cold Shutdown condition or Refuel mode.

Justification for Change

NRC letter to All Power Reactor Licensees dated April 10, 1980, requested that the provisions of certain model technical specifications be added to each licensee's technical specifications. Among these was model Boiling Water Reactor Limiting Condition for Operation (LCO) 3.0.5. Model LCO 3.0.5 contained the sentence, "This specification is not applicable in Conditions 4 or 5."

Two minor mistakes were made in adopting this sentence of model LCO 3.0.5 to be BFN technical specification definition 1.0.C.2. These mistakes resulted in confusion about when definition 1.0.C.2 may be applied.

First, the word "specification" in the model LCO should have been changed to "definition" to adapt from an LCO to a definition format. Instead, "specification" was deleted without being replaced by "definition."

Second, the phrase "if the unit is already" was added, probably copied from an early GE-STS (BWR/4) LCO 3.0.5. In a later edition GE-STS (BWR/4), LCO 3.0.5 was deleted and replaced by a combination of a revised definition of Operable-Operability and a new action (c) in LCO 3.8.11. This change to GE-STS (BWR/4) made the old concept represented by the early GE-STS (BWR/4) LCO 3.0.5 only applicable in Operational Conditions 1, 2, and 3 (Power Operation, Startup, and Hot Shutdown). The sentence in model LCO 3.0.5 reflected this restriction of applicability.

Since this proposed amendment will clarify the applicability of the definition in accordance with the history shown and since the revised wording will be more restrictive than the current definition, TVA has concluded that the margin of safety will not be reduced.

ENCLOSURE 3
DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION
BROWNS FERRY NUCLEAR PLANT

Description of Amendment Request

The proposed amendment would change the technical specifications of Browns Ferry Nuclear Plant (BFN) units 1, 2, and 3 to clarify the applicability of definition 1.0.C.2 so that the definition will not be erroneously applied while in Cold Shutdown or Refueling. This clarification is made by changing the sentence, "This is not applicable if the unit is already in Cold Shutdown or Refueling." to read "This definition is not applicable in Cold Shutdown or Refueling."

Basis for Proposed Determination of No Significant Hazards Consideration

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 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, (2) create the possibility of a new or different kind of accident from an accident previously evaluated, or (3) involve a significant reduction in a margin of safety .

1. By clarifying that the provisions of definition 1.0.C.2 are not applicable during Cold Shutdown and Refueling, application of definition 1.0.C.2 is restricted to the operating conditions intended in the model LCO 3.0.5 provided by NRC letter dated April 10, 1980 to All Power Reactor Licensees. This clarification of the applicability of definition 1.0.C.2 only during the Run and Startup/Hot Standby modes and the Hot Shutdown condition will not result in any increase in the probability or consequences of an accident previously analyzed since it is more restrictive and consistent with the assumptions of current analyses.

2. This clarification that the provisions of definition 1.0.C.2 are applicable only during the Run and Startup/Hot Standby modes and the Hot Shutdown condition will not eliminate or modify any protective functions. It does not permit any new operational conditions. It is essentially an additional restriction. Therefore, no possibility of any new or different kind of accident is created by this clarification.

3. This clarification of the applicability of definition 1.0.C.2 only during the Run and Startup/Hot Standby modes and Hot Shutdown condition is administrative in nature. It does not involve any reduction in any margin of safety.

Since the application for amendment involves a proposed change that is encompassed by the criteria for which no significant hazards consideration exists, TVA has made a proposed determination that the application involves no significant hazards consideration.