

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATIONS REVISIONS

BROWNS FERRY NUCLEAR PLANT

UNITS 1, 2, AND 3

(TVA BFN TS 238)

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UNITS 1, 2, AND 3

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3.7/4.7-19
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3.7/4.7-21
3.9/4.9-4
3.11/4.11-3

3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.7.E. Control Room Emergency Ventilation

1. Except as specified in Specification 3.7.E.3 below, both control room emergency pressurization systems shall be OPERABLE at all times when any reactor vessel contains irradiated fuel.

2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal when tested in accordance with ANSI N510-1975.

- b. The results of laboratory carbon sample analysis shall show $\geq 90\%$ radioactive methyl iodide removal at a velocity when tested in accordance with ANSI N510-1975 (130°C, 95% R.H.).

- c. System flow rate shall be shown to be within $\pm 10\%$ design flow when tested in accordance with ANSI N510-1975.

SURVEILLANCE REQUIREMENTS

4.7.E Control Room Emergency Ventilation

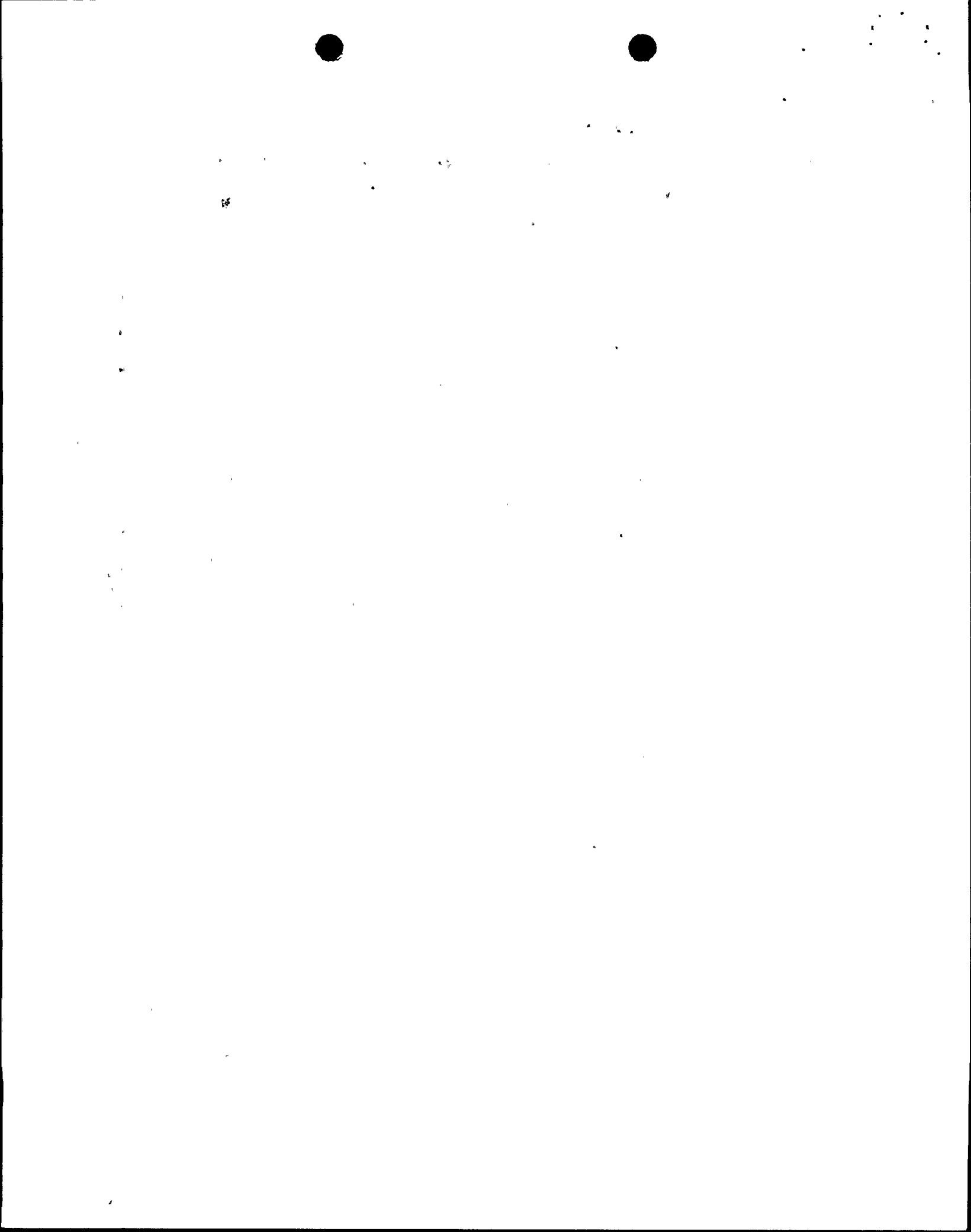
1. At least once every 18 months, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at system design flow rate ($\pm 10\%$).

2. a. The tests and sample analysis of Specification 3.7.E.2 shall be performed at least once per operating cycle or once every 18 months, whichever occurs first for standby service or after every 720 hours of system operation and following significant painting, fire, or chemical release in any ventilation zone communicating with the system.

- b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.

- c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.

- d. Each circuit shall be operated at least 10 hours every month.



3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.7.E. Control Room Emergency Ventilation

3. From and after the date that one of the control room emergency pressurization systems is made or found to be INOPERABLE for any reason, reactor operation or refueling operations is permissible only during the succeeding 7 days unless such circuit is sooner made OPERABLE.
4. If these conditions cannot be met, reactor shutdown shall be initiated and all reactors shall be in Cold Shutdown within 24 hours for reactor operations and refueling operations shall be terminated within 2 hours.

SURVEILLANCE REQUIREMENTS

4.7.E. Control Room Emergency Ventilation

3. At least once every 18 months, automatic initiation of the control room emergency pressurization system shall be demonstrated.

4. During the simulated automatic actuation test of this system (see Table 4.2.G), it shall be verified that the following dampers operate as indicated:

Close: FCO-150 B, D, E, and F
Open: FCO-151,
FCO-152

3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.7.F. Primary Containment Purge System

1. The primary containment shall be normally vented and purged through the primary containment purge system. The standby gas treatment system may be used when primary containment purge system is INOPERABLE.

2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal when tested in accordance with ANSI N510-1975.

- b. The results of laboratory carbon sample analysis shall show $\geq 85\%$ radioactive methyl iodide removal when tested in accordance with ANSI N510-1975 (130°C 95% R.H.).

- c. System flow rate shall be shown to be within $\pm 10\%$ of design flow when tested in accordance with ANSI N510-1975.

SURVEILLANCE REQUIREMENTS

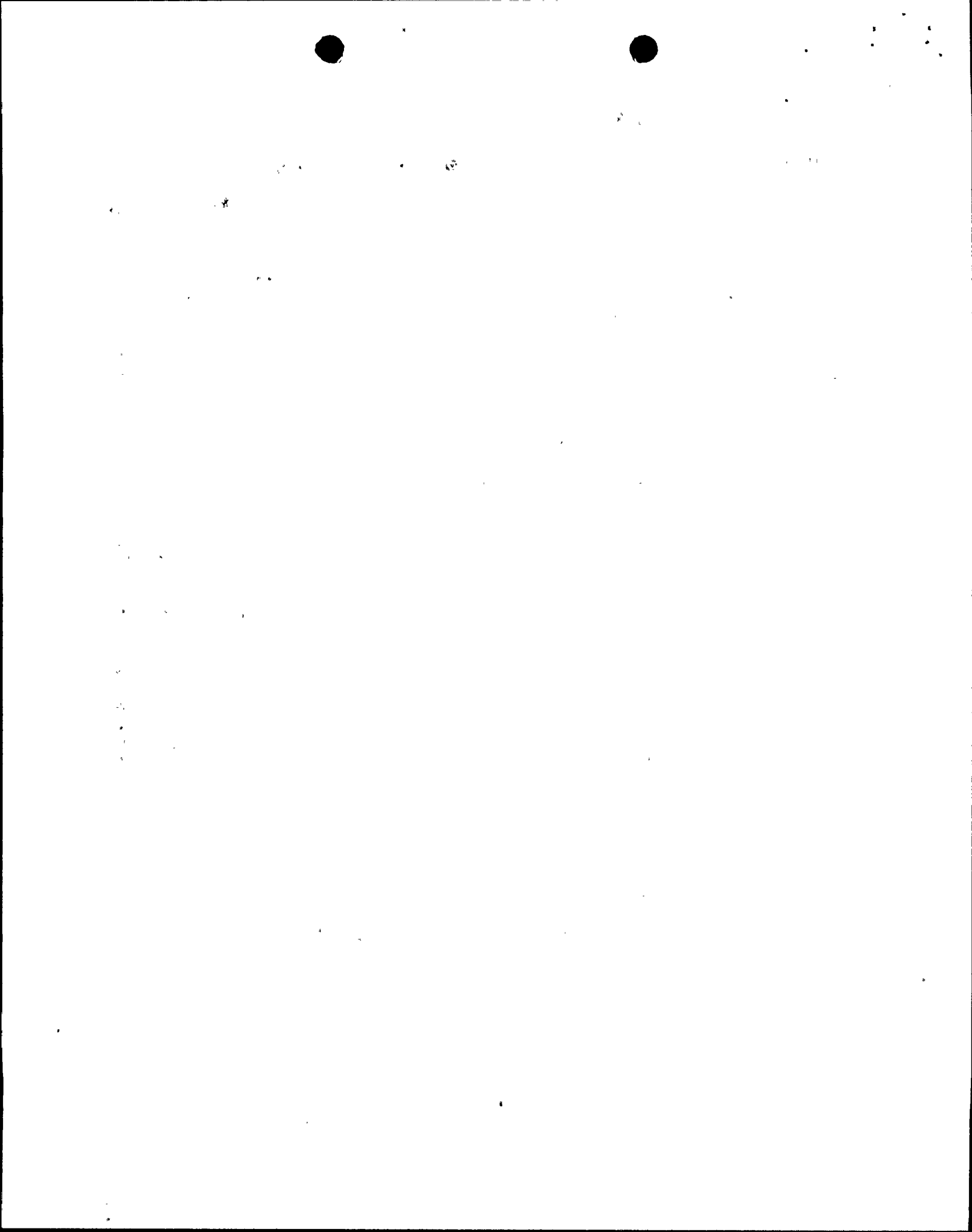
4.7.F. Primary Containment Purge System

1. At least once every 18 months, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 8.5 inches of water at system design flow rate ($\pm 10\%$).

2. a. The tests and sample analysis of Specification 3.7.F.2 shall be performed at least once per operating cycle or once every 18 months, whichever occurs first or after 720 hours of system operation and following significant painting, fire, or chemical release in any ventilation zone communicating with the system.

- b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.

- c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.



3.9/4.9 AUXILIARY ELECTRICAL SYSTEM

LIMITING CONDITIONS FOR OPERATION

3.9.A. Auxiliary Electrical Equipment

2. The reactor shall not be started up (made critical) from the hot standby condition unless all of the following conditions are satisfied:

a. At least one offsite power source is available as specified in 3.9.A.1.c.

b. Three units 1 and 2 diesel generators shall be OPERABLE.

c. An additional source of power consisting of one of the following:

(1) A second offsite power source available as specified in 3.9.A.1.c.

(2) A fourth OPERABLE units 1 and 2 diesel generator.

d. Requirements 3.9.A.3 through 3.9.A.6 are met.

SURVEILLANCE REQUIREMENTS

4.9.A. Auxiliary Electrical System

2. DC Power System - Unit Batteries (250-V), Diesel-Generator Batteries (125-V) and Shutdown Board Batteries (250-V)

a. Every week the specific gravity, voltage and temperature of the pilot cell and overall battery voltage shall be measured and logged.

b. Every three months the measurement shall be made of voltage of each cell to nearest 0.1 volt, specific gravity of each cell, and temperature of every fifth cell. These measurements shall be logged.

c. At least once every 24 months, a battery rated discharge (capacity) test shall be performed and the voltage, time, and output current measurements shall be logged.

3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.7.E. Control Room Emergency Ventilation

1. Except as specified in Specification 3.7.E.3 below, both control room emergency pressurization systems shall be OPERABLE at all times when any reactor vessel contains irradiated fuel.
2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal when tested in accordance with ANSI N510-1975.

b. The results of laboratory carbon sample analysis shall show $\geq 90\%$ radioactive methyl iodide removal at a velocity when tested in accordance with ANSI N510-1975 (130°C, 95% R.H.).

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SURVEILLANCE REQUIREMENTS

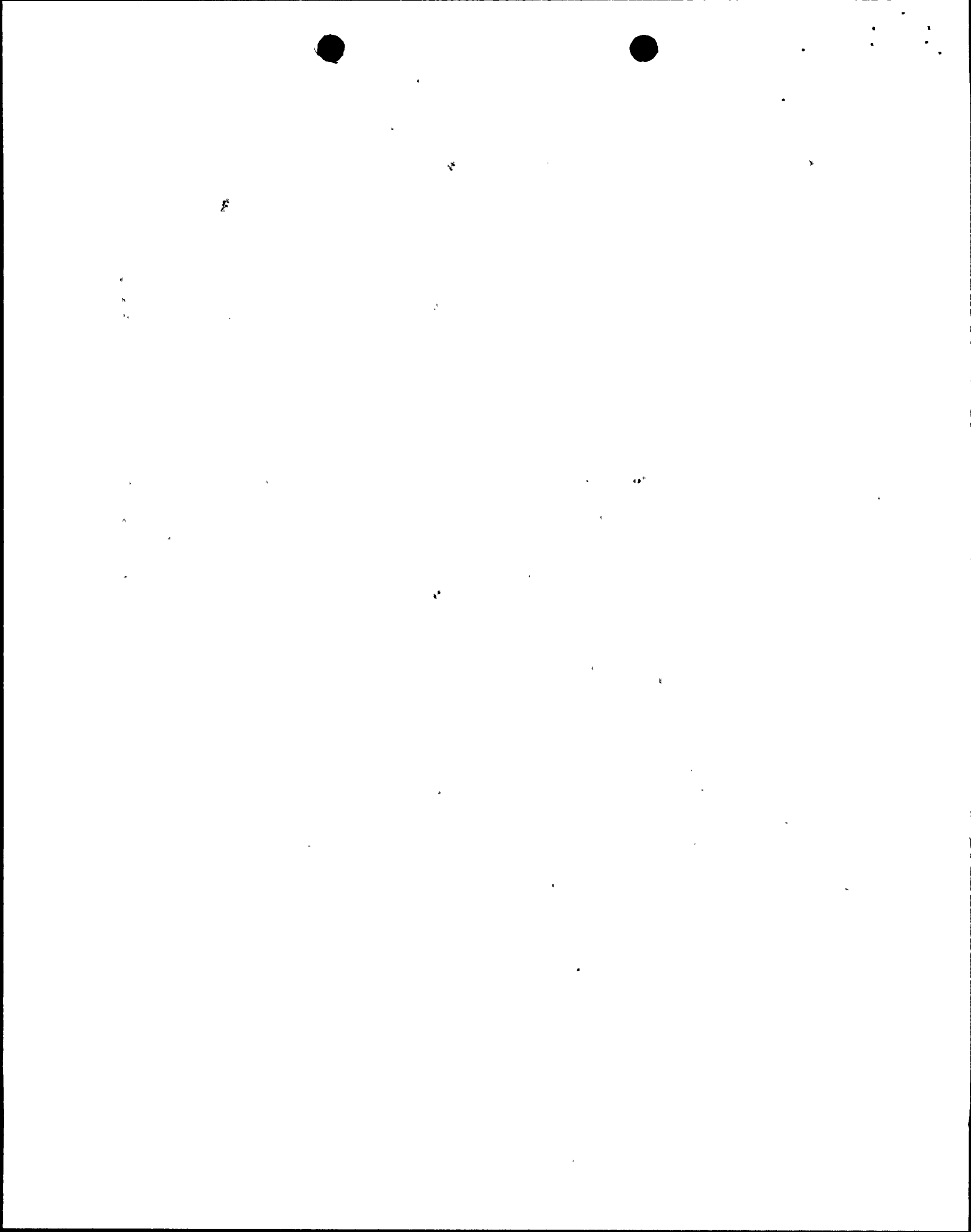
4.7.E Control Room Emergency Ventilation

1. At least once every 18 months, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at system design flow rate ($\pm 10\%$).
2. a. The tests and sample analysis of Specification 3.7.E.2 shall be performed at least once per operating cycle or once every 18 months, whichever occurs first for standby service or after every 720 hours of system operation and following significant painting, fire, or chemical release in any ventilation zone communicating with the system.

b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.

c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.

d. Each circuit shall be operated at least 10 hours every month.



3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.7.E. Control Room Emergency Ventilation

3. From and after the date that one of the control room emergency pressurization systems is made or found to be INOPERABLE for any reason, reactor operation or refueling operations is permissible only during the succeeding 7 days unless such circuit is sooner made OPERABLE.
4. If these conditions cannot be met, reactor shutdown shall be initiated and all reactors shall be in Cold Shutdown within 24 hours for reactor operations and refueling operations shall be terminated within 2 hours.

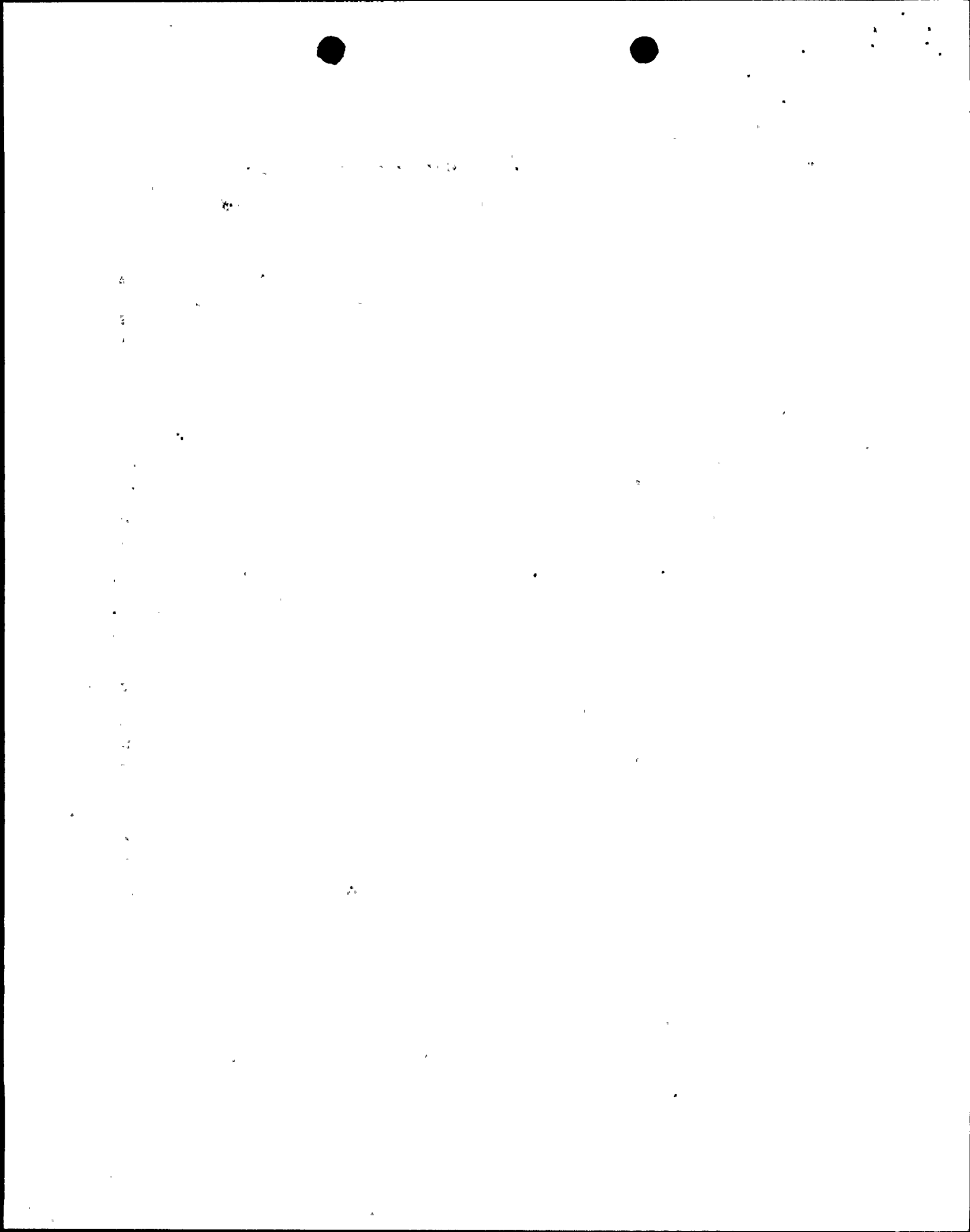
SURVEILLANCE REQUIREMENTS

4.7.E. Control Room Emergency Ventilation

3. At least once every 18 months, automatic initiation of the control room emergency pressurization system shall be demonstrated.

4. During the simulated automatic actuation test of this system (see Table 4.2.G), it shall be verified that the following dampers operate as indicated:

Close: FCO-150 B, D, E, and F
Open: FCO-151
FCO-152



3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

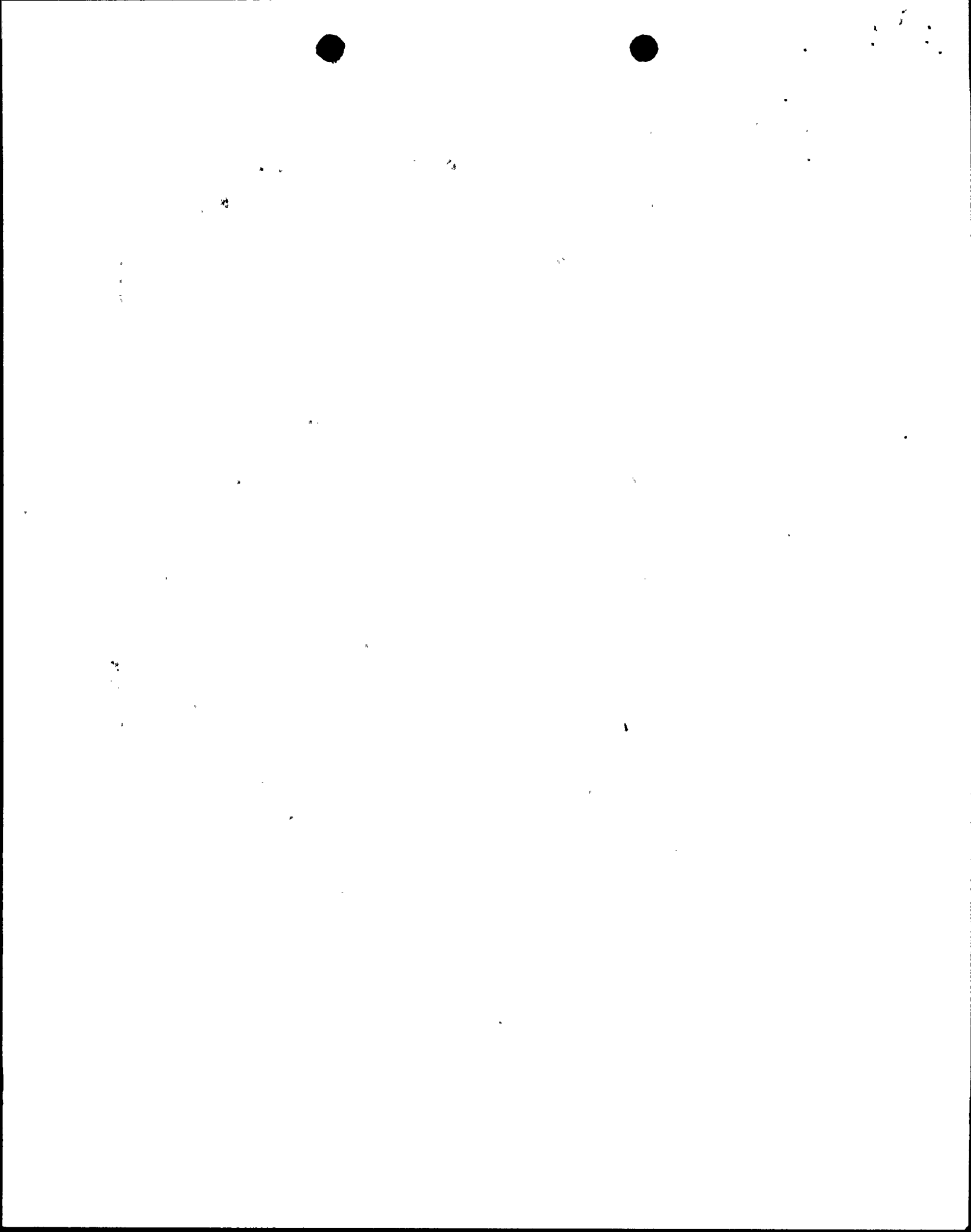
3.7.F. Primary Containment Purge System

1. The primary containment shall be normally vented and purged through the primary containment purge system. The standby gas treatment system may be used when primary containment purge system is INOPERABLE.
2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal when tested in accordance with ANSI N510-1975.
- b. The results of laboratory carbon sample analysis shall show $\geq 85\%$ radioactive methyl iodide removal when tested in accordance with ANSI N510-1975 (130°C 95% R.H.).
- c. System flow rate shall be shown to be within $\pm 10\%$ of design flow when tested in accordance with ANSI N510-1975.

SURVEILLANCE REQUIREMENTS

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- b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.
- c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.



3.9/4.9 AUXILIARY ELECTRICAL SYSTEM

LIMITING CONDITIONS FOR OPERATION

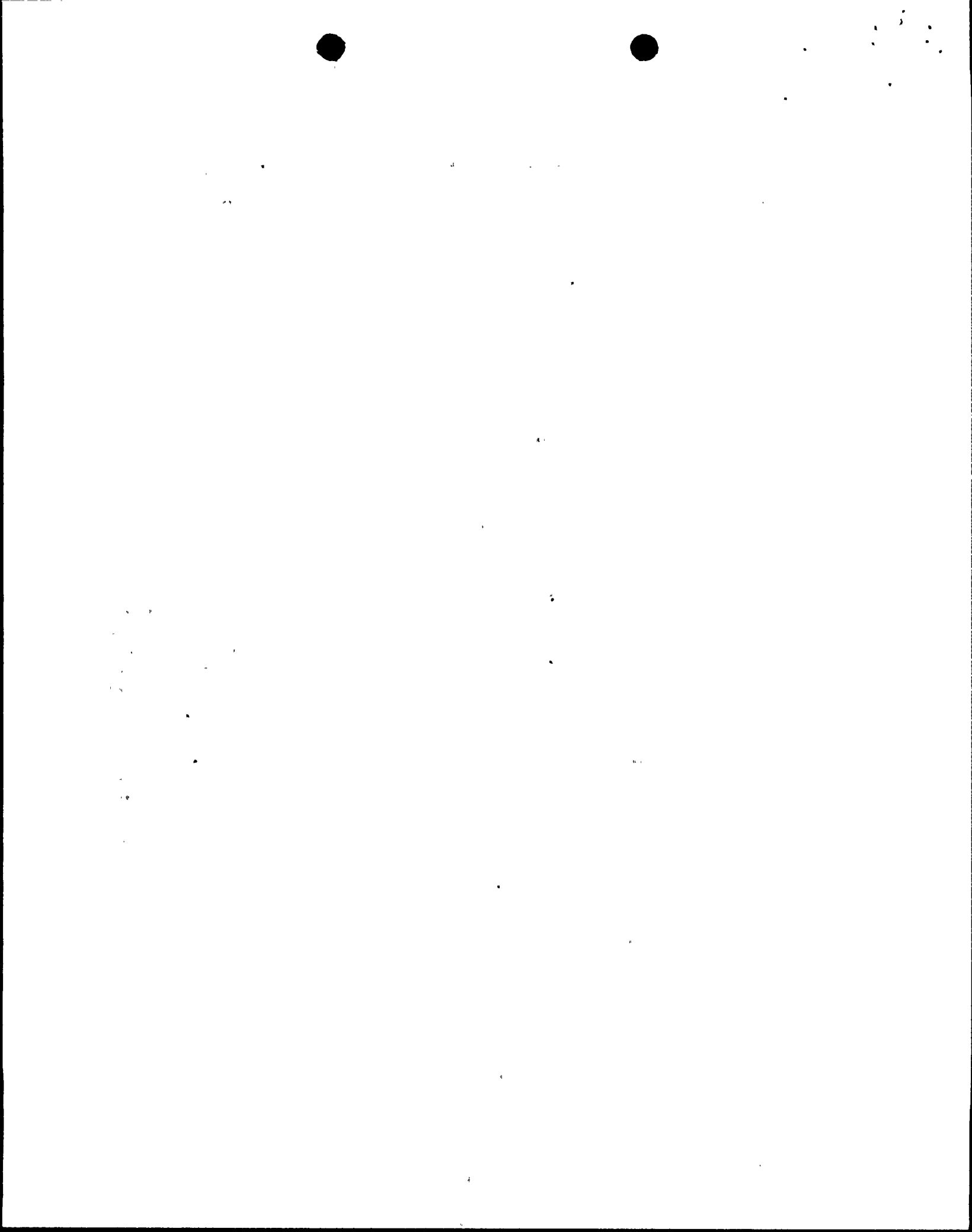
3.9.A. Auxiliary Electrical Equipment

2. The reactor shall not be started up (made critical) from the hot standby condition unless all of the following conditions are satisfied:
 - a. At least one offsite power source is available as specified in 3.9.A.1.c.
 - b. Three units 1 and 2 diesel generators shall be OPERABLE.
 - c. An additional source of power consisting of one of the following:
 - (1) A second offsite power source available as specified in 3.9.A.1.c.
 - (2) A fourth OPERABLE units 1 and 2 diesel generator.
 - d. Requirements 3.9.A.3 through 3.9.A.6 are met.

SURVEILLANCE REQUIREMENTS

4.9.A. Auxiliary Electrical System

2. DC Power System - Unit Batteries (250-V), Diesel-Generator Batteries (125-V) and Shutdown Board Batteries (250-V)
 - a. Every week the specific gravity, voltage and temperature of the pilot cell and overall battery voltage shall be measured and logged.
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 - c. At least once every 24 months, a battery rated discharge (capacity) test shall be performed and the voltage, time, and output current measurements shall be logged.



3.11/4.11 FIRE PROTECTION SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.11.A. High Pressure Fire Protection System

area where protection is lost is checked hourly.

3. If only one high pressure fire pump is OPERABLE, the reactors may remain in operation for a period not to exceed 7 days, provided the requirements of Specification 3.11.A.1.b above are met.
4. If Specification 3.11.A.3 cannot be met, the reactors shall be placed in the Cold Shutdown condition in 24 hours.
5. Removal of any component in the High Pressure Fire System from service for any reason other than testing or emergency operations shall require Plant Superintendent approval.
6. The Raw Service Water storage tank level shall be maintained above level 723'7" by the raw service water pumps.

SURVEILLANCE REQUIREMENTS

4.11.A. High Pressure Fire Protection System

3. Raw Service Water System Testing

<u>Item</u>	<u>Frequency</u>
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Simulated automatic and manual actuation of raw service water pumps and operation of tank level switches.	Once/year
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4. The high pressure fire protection system pressure shall be logged daily.
5. Principal header and component isolation valves shall be checked open at least once every 3 months.

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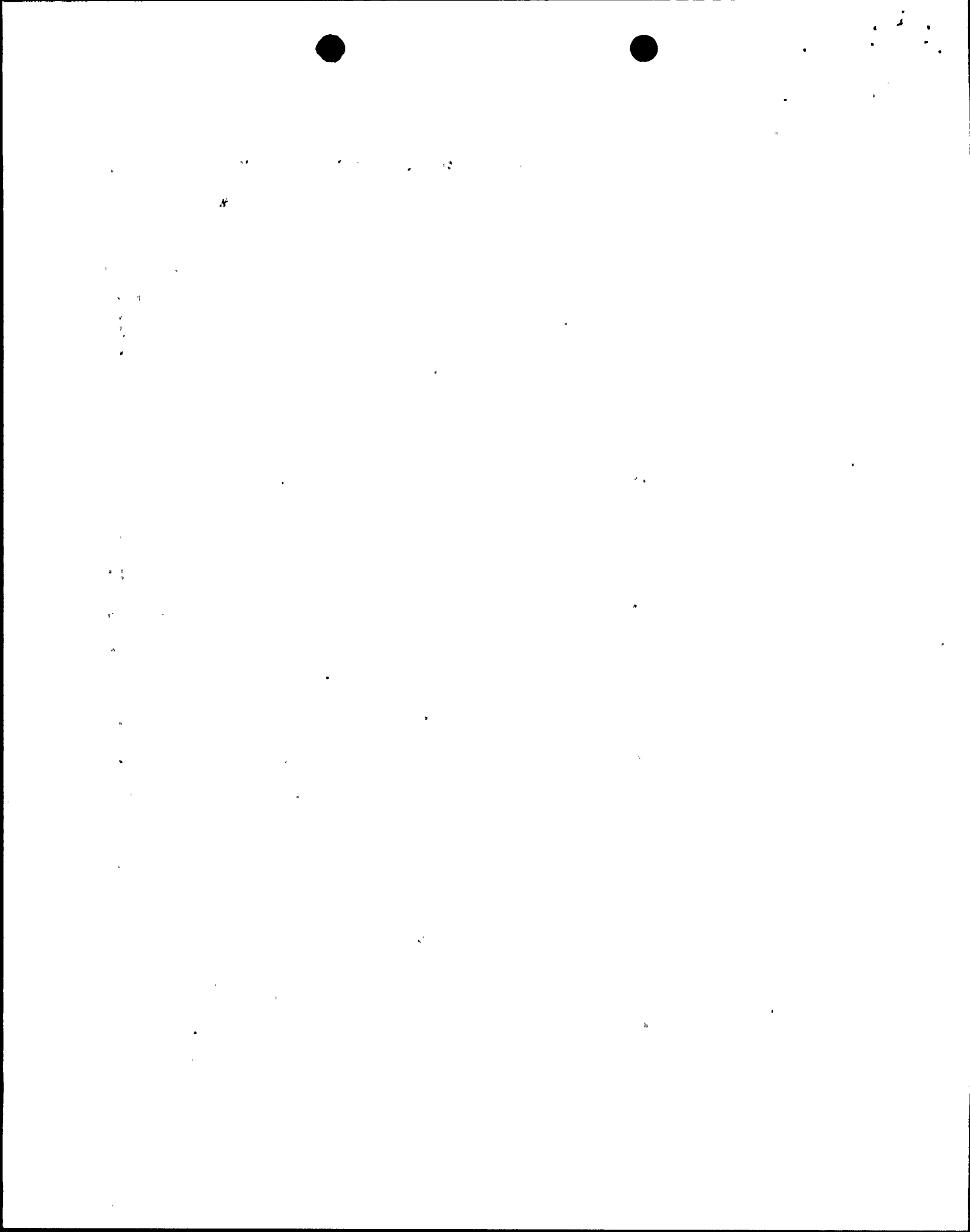
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3.7/4.7 CONTAINMENT SYSTEMS

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2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal when tested in accordance with ANSI N510-1975.

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4.7.E Control Room Emergency Ventilation

1. At least once every 18 months, the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at system design flow rate ($\pm 10\%$).

2. a. The tests and sample analysis of Specification 3.7.E.2 shall be performed at least once per operating cycle or once every 18 months, whichever occurs first for standby service or after every 720 hours of system operation and following significant painting, fire, or chemical release in any ventilation zone communicating with the system.

- b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.

- c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.

- d. Each circuit shall be operated at least 10 hours every month.

3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

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SURVEILLANCE REQUIREMENTS

4.7.E. Control Room Emergency Ventilation

3. At least once every 18 months, automatic initiation of the control room emergency pressurization system shall be demonstrated.

4. During the simulated automatic actuation test of this system (see Table 4.2.G), it shall be verified that the following dampers operate as indicated:

Close: FCO-150 B, D, E, and F
Open: FCO-151,
FCO-152

3.7/4.7 CONTAINMENT SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.7.F. Primary Containment Purge System

1. The primary containment shall be normally vented and purged through the primary containment purge system. The standby gas treatment system may be used when primary containment purge system is INOPERABLE.

2. a. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal when tested in accordance with ANSI N510-1975.

- b. The results of laboratory carbon sample analysis shall show $\geq 85\%$ radioactive methyl iodide removal when tested in accordance with ANSI N510-1975 (130°C 95% R.H.).

- c. System flow rate shall be shown to be within $\pm 10\%$ of design flow when tested in accordance with ANSI N510-1975.

SURVEILLANCE REQUIREMENTS

4.7.F. Primary Containment Purge System

1. At least once every 18 months the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 8.5 inches of water at system design flow rate ($\pm 10\%$).

2. a. The tests and sample analysis of Specification 3.7.F.2 shall be performed at least once per operating cycle or once every 18 months, whichever occurs first or after 720 hours of system operation and following significant painting, fire, or chemical release in any ventilation zone communicating with the system.

- b. Cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing.

- c. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing.



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3.9/4.9 AUXILIARY ELECTRICAL SYSTEM

LIMITING CONDITIONS FOR OPERATION

3.9.A. Auxiliary Electrical Equipment

2. The reactor shall not be started up (made critical) from the Hot Standby condition unless all of the following conditions are satisfied:

a. At least one offsite power source is available as specified in 3.9.A.1.c.

b. Three units 3 diesel generators shall be OPERABLE.

c. An additional source of power consisting of one of the following:

(1) A second offsite power source available as specified in 3.9.A.1.c.

(2) A fourth unit 3 diesel generator OPERABLE.

d. Requirements 3.9.A.3 through 3.9.A.6 are met.

SURVEILLANCE REQUIREMENTS

4.9.A. Auxiliary Electrical System

2. DC Power System - Unit Batteries (250-V), Diesel-Generator Batteries (125-V) and Shutdown Board Batteries (250-V)

a. Every week the specific gravity, voltage, and temperature of the pilot cell, and overall battery voltage shall be measured and logged.

b. Every three months the measurements shall be made of voltage of each cell to nearest 0.1 volt, specific gravity of each cell, and temperature of every fifth cell. These measurements shall be logged.

c. At least once every 24 months, a battery rated discharge (capacity) test shall be performed and the voltage, time, and output current measurements shall be logged.

3.11/4.11 FIRE PROTECTION SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.11.A. High Pressure Fire Protection System

3.11.A.2. (Cont'd)

area where protection is lost is checked hourly.

3. If only one high pressure fire pump is OPERABLE, the reactors may remain in operation for a period not to exceed 7 days, provided the requirements of Specification 3.11.A.1.b above are met.
4. If Specification 3.11.A.3 cannot be met, the reactors shall be placed in the Cold Shutdown condition in 24 hours.
5. Removal of any component in the High Pressure Fire System from service for any reason other than testing or emergency operations shall require Plant Superintendent approval.
6. The Raw Service Water storage tank level shall be maintained above level 723'7" by the raw service water pumps.

SURVEILLANCE REQUIREMENTS

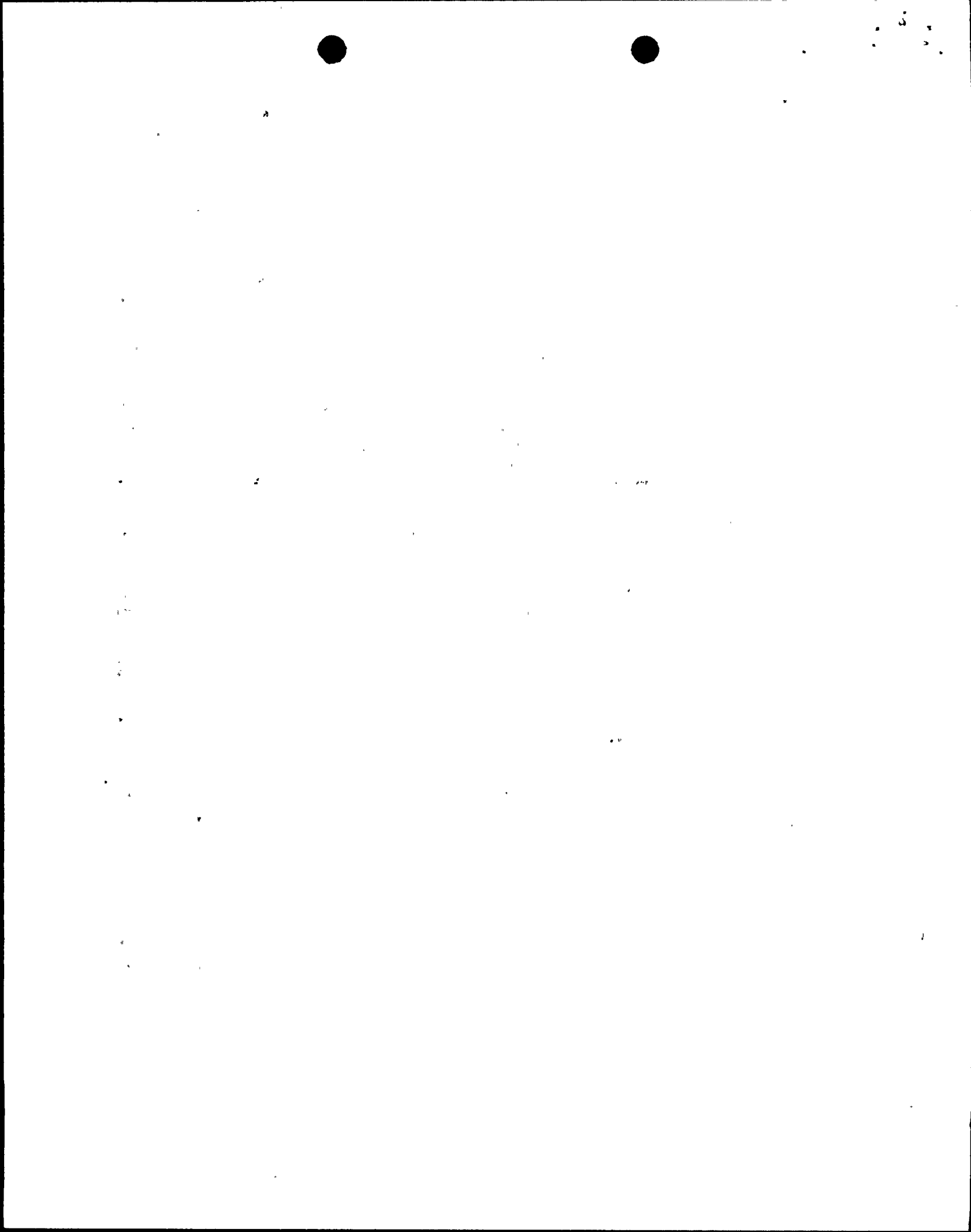
4.11.A. High Pressure Fire Protection System

3. Raw Service Water System Testing

<u>Item</u>	<u>Frequency</u>
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Simulated automatic and manual actuation of raw service water pumps and operation of tank level switches.	Once/year
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4. The high pressure fire protection system pressure shall be logged daily.
5. Principal header and component isolation valves shall be checked open at least once every 3 months.



ENCLOSURE 2

Description and Justification Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3

Description of Change

BFN Units 1, 2, and 3 Technical Specifications are being revised to replace "not to exceed" with "at least once every" for five Surveillance Requirements. This will allow interval extensions per BFN Technical Specification definition of surveillance.

The following technical specification Surveillance Requirements (SR) are affected by this change:

- SR 4.7.E.1 (page 3.7/4.7-19) - Control Room Emergency Ventilation System pressure drops across the combined HEPA filters and charcoal adsorber banks.
- SR 4.7.E.3 (page 3.7/4.7-20) - Control Room Emergency Ventilation System automatic initiation of the system.
- SR 4.7.F.1 (page 3.7/4.7-21) - Primary Containment Purge System pressure drop across the combined HEPA filters and charcoal adsorber banks.

The current technical specification words "at least once per operating cycle, not to exceed 18 months" are replaced by "at least once every 18 months."

- SR 4.9.A.2.c (page 3.9/4.9-4) - Auxiliary Electrical System battery rated discharge test.

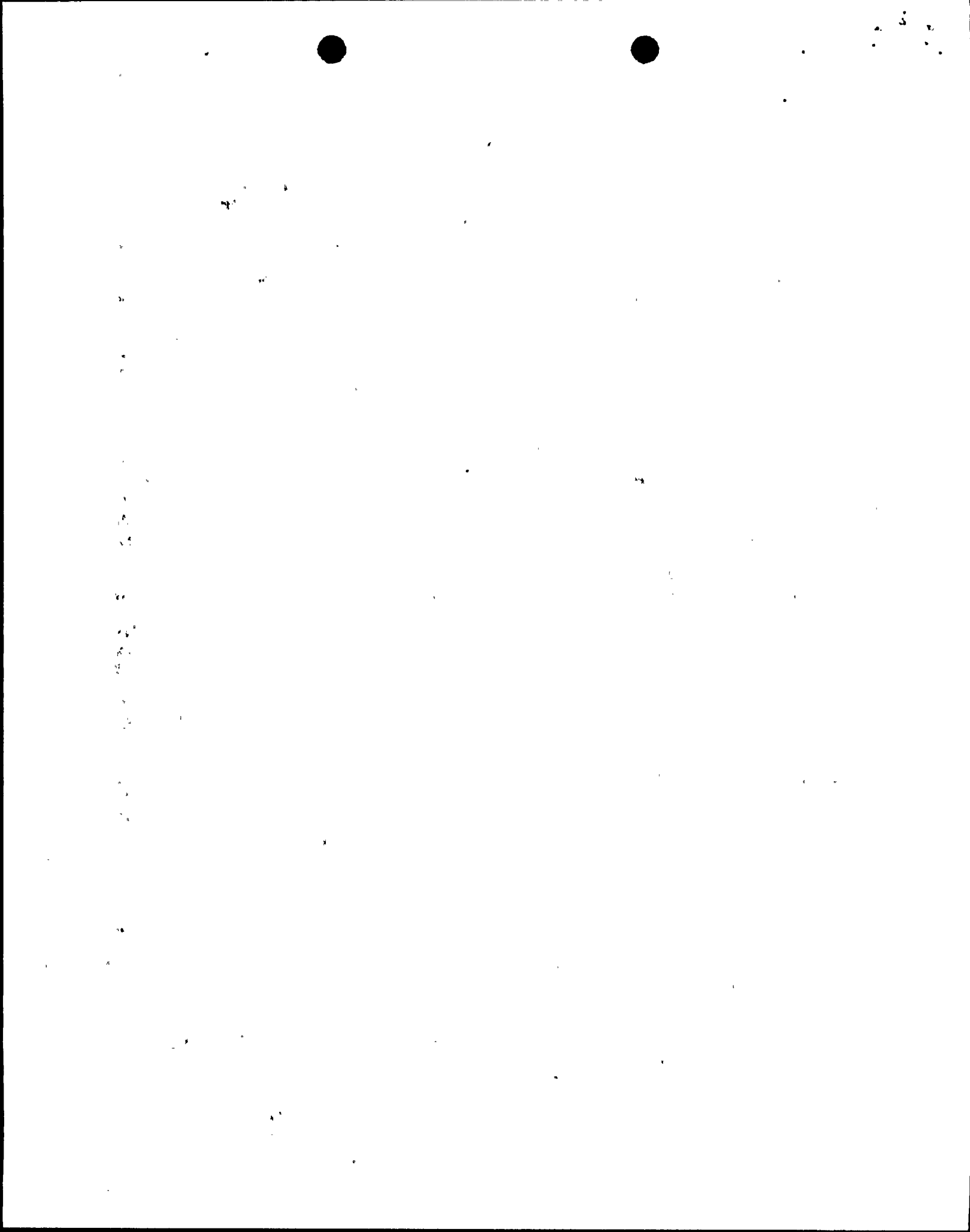
The current technical specification words "at intervals not to exceed 24 months" are replaced by "at least once every 24 months."

- SR 4.11.A.5 (page 3.11/4.11-3) - High Pressure Fire Protection System, Raw Service Water System principal header, and component isolation valve checks.

The current technical specification words "at intervals no greater than 3 months" are replaced by "at least once every 3 months."

Reason for Change

These five SR intervals are unlike other BFN Technical Specification surveillance intervals in that their language does not permit application of BFN TS definition 1.0.LL, Surveillance. This results in inconsistency and a potential for misapplication of the surveillance intervals.



Justification for Change

The language change makes these five surveillance requirements consistent with other BFN surveillance intervals in that it permits the application of surveillance (definition 1.0.LL page 1.0-11). This definition allows a maximum extension of a single surveillance interval not to exceed 25 percent of the interval. The combined time for any three consecutive surveillance intervals is not to exceed 3.25 times the specified surveillance interval. Thus this wording change adds flexibility to the surveillance scheduling without any significant impact on the surveillance intervals.

Surveillance Requirement 4.7.E.1 demonstrates that the Control Room Emergency Ventilation filters and adsorbers are not clogged with excessive amounts of foreign matter. This is done by measuring the pressure drop across the combined filters and charcoal adsorber banks. A review of the data collected during performance of the surveillance shows that the recorded pressure drop is less than one half of the technical specification limit. This surveillance is normally scheduled during refuel outages. This change is in agreement with standard technical specifications and the custom technical specifications of Peach Bottom and Cooper Nuclear Station. Deleting the once-per-operating cycle phrase will not result in a significant change in the requirements since the 18-month interval corresponds to the planned operating cycle and will almost always be the most restrictive surveillance interval.

Surveillance Requirement 4.7.E.3 demonstrates the automatic initiation function of the Control Room Emergency Ventilation System. The same justification as above applies to this surveillance requirement. In addition, the circuitry is not anymore time dependent than any of the other initiation circuits which are tested at 18-month intervals.

The same justification applies to surveillance requirement 4.7.F.1 which demonstrates that the Primary Containment Purge System filters and adsorbers are not clogged with foreign material.

Surveillance requirement 4.9.A.2.c demonstrates that the unit batteries, the diesel generator batteries, and the shutdown board batteries have maintained their rated capacities by performing a rated discharge. The change in the surveillance interval to "at least once every 24 months" does not decrease the confidence that the batteries are at rated capacity. Pilot cell and individual cell tests are performed at frequencies that would indicate irregularities long before failure.

Surveillance requirement 4.11.A.5 verifies that the fire protection header and component isolation valves are open. The change to once every three months is consistent with other surveillance intervals and will not increase the probability of a mispositioned valve going undetected for a long period of time.

The intent of surveillance requirements to ensure system operability is not affected by this change. Although the average surveillance interval may be slightly longer, the definition of surveillance allows for this. No adverse safety consequences result from the proposed change. The change improves nuclear safety by minimizing unnecessary plant shutdowns that may be required by inadvertently exceeding the present absolute time intervals.

ENCLOSURE 3

Determination of No Significant Hazards Consideration
Browns Ferry Nuclear Plant (BFN)
Units 1, 2, and 3

Description of Proposed TS Amendment

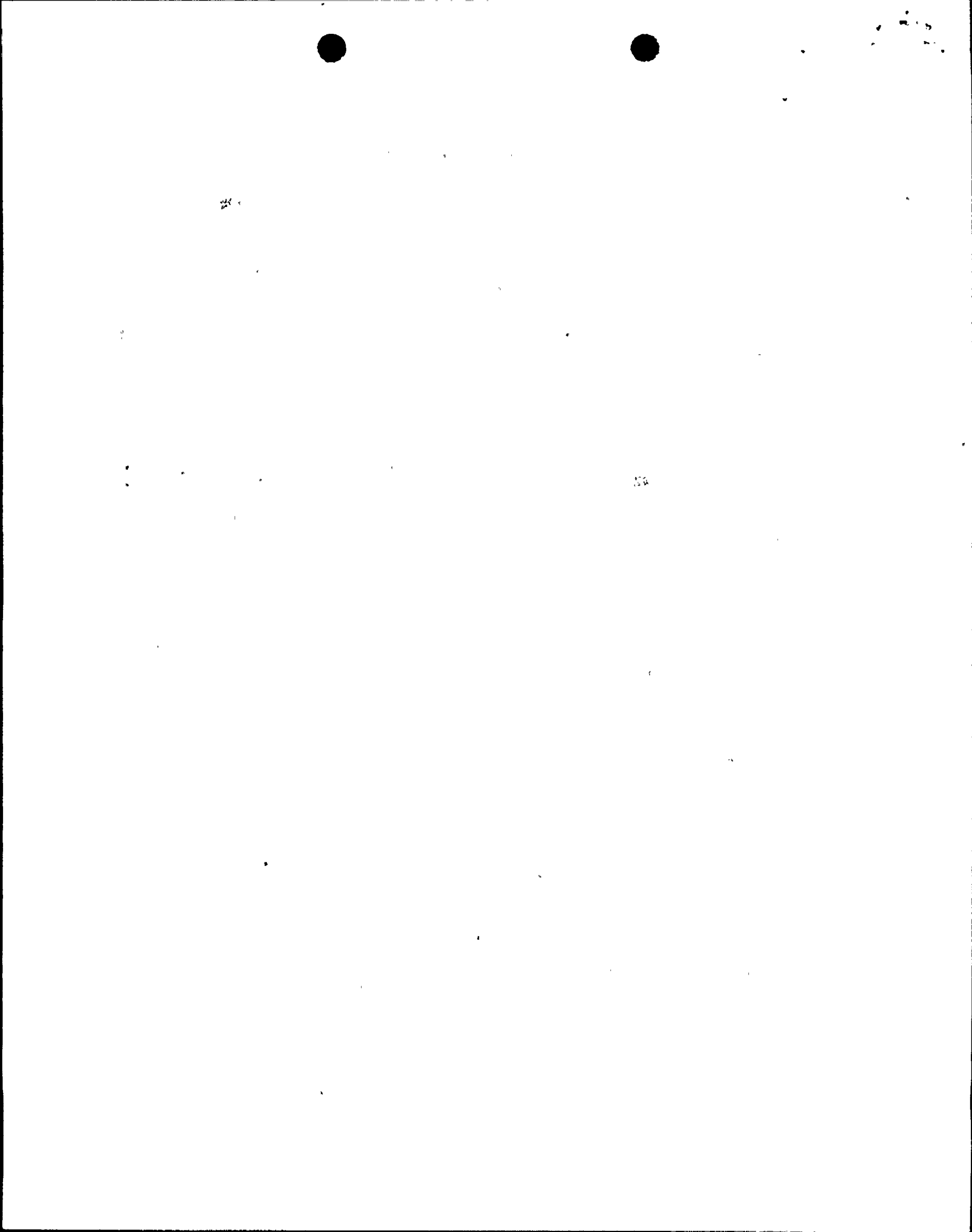
The proposed amendment would change the BFN TS for units 1, 2, and 3 to eliminate the unnecessary and inappropriate use of absolute surveillance intervals for TS 4.7.E.1, 4.7.E.3, 4.7.F.1, 4.9.A.2.c, and 4.11.A.5. This amendment would then allow application of the provisions of BFN TS Definition 1.0.LL, Surveillance.

Basis for Proposed No Significant Hazards Consideration Determination

NRC has provided standards for determining whether a change to the facility operating license or the technical specifications involves a significant hazards consideration, 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 the margin of safety.

A discussion of these standards, as they relate to this amendment, is as follows.

1. The probability or consequences of an accident previously evaluated in the BFN Final Safety Analysis Report (FSAR) would not be affected by these TS changes. The BFN systems affected by these proposed amendments are not typically considered in determining accident probabilities. The consequences of an accident are not affected since the limiting conditions for operation and the types of surveillance testing used to confirm operability are not changed. In addition, the SR interval extension which would be allowed under the application of TS Definition 1.0.LL is consistent with the original intent of the TS surveillances for these BFN systems (as evidenced by other BFN TS surveillance intervals, other BWR custom TS, and the General Electric Standard TS for similar system applications). As such, the criteria set forth in 10 CFR 50.92(c)(1) is satisfied.
2. The possibility of a new or different kind of accident than previously evaluated in the BFN FSAR would not be created by the proposed TS changes. These changes will not eliminate or modify any protective functions and will not permit any new plant operational conditions. In addition, these changes do not eliminate or modify the type of surveillance testing done on these systems. Application of TS Definition



Basis for Proposed No Significant Hazards Consideration Determination (Cont'd)

- 1.0.LL in these cases cannot create a new type of accident since flexibility in the SR time intervals is the only change proposed. Based on this, the criteria set forth in 10 CFR 50.92(c)(2) is satisfied.
3. The margin of nuclear safety is not reduced by the proposed changes. These changes do not modify the intent of BFN TS. Application of TS Definition 1.0.LL to these BFN SRs is consistent with similar system applications in other BFN TS surveillances, other BWR custom TS surveillances, and the GE-STs. Based on this, the criteria set forth in 10 CFR 50.92(c)(3) is satisfied.

Since the application for amendment involves a proposed change that is encompassed by the criteria for which no significant hazards consideration exists, TVA proposes to determine that the proposed amendment does not involve a significant hazards consideration.