ENCLOSURE 1

BROWNS FERRY NUCLEAR PLANT

TECHNICAL SPECIFICATION 266

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TABLE 3.2.F (cont'd)

Surveillance Instrumentation

Minimum # of Operable Instrument Channels	Instrument #	Instrument	Type Indication and Range	Notes
2	H_2M - 76 - 94 H_2M - 76 - 104	Drywell and Torus Hydrogen Concentration	0.1 - 20%	(1)
2	PdI-64-137 PdI-64-138	Drywell to Suppression Chamber Differential Pressure	Indicator 0 to 2 psid	(1) (2) (3)
1/Valve		Relief Valve Tailpipe Thermocouple Temperature or Acoustic Monitor on Relief Valve Tailpipe		(5)
1	RR-90-272CD RR-90-273CD	High Range Primary Containment Radiation Recorders	Recorder $1-10^7$ R/Hr	(7)(8)
2	LI-64-159A XR-64-159	Suppression Chamber Water Level-Wide Range	Indicator, Recorder 0-240"	(1) (2) (3)
2	PI-64-160A XR-64-159	Drywell Pressure Wide Range	Indicator, Recorder) 0-300 psig ,)	(1) (2) (3)
2	TI-64-161 TR-64-161 TI-64-162 TR-64-162	Suppression Pool Bulk Temperature	Indicator, Recorder)) 30° - 230° F))	(1) (2) (3) (4) (6)
1	RM-90-306	Wide Range Gaseous Effluent Radiation Monitor	Monitor (Noble Gas 10^{-7} - 10^{+5} μCi/cc)	(7)(8)(9)

NOTES FOR TABLE 3.2.F

(1) From and after the date that one of these parameters is reduced to one indication, continued operation is permissible during the succeeding 30 days unless such instrumentation is sooner made OPERABLE.

(2) From and after the date that one of these parameters is not indicated in the control room, continued operation is permissible during the succeeding seven days unless such instrumentation is sooner made OPERABLE.

(3) If the requirements of notes (1) and (2) cannot be met, and if one of the indications cannot be restored in (6) hours, an orderly shutdown shall be initiated and the reactor shall be in a COLD SHUTDOWN CONDITION within 24 hours.

(4) These surveillance instruments are considered to be redundant to each other.

(5) From and after the date that both the acoustic monitor and the temperature indication on any one valve fails to indicate in the control room, continued operation is permissible during the succeeding 30 days, unless one of the two monitoring channels is sooner made OPERABLE. If both the primary and secondary indication on any SRV tailpipe is INOPERABLE, the torus temperature will be monitored at least once per shift to observe any unexplained temperature increase which might be indicative of an open SRV.

(6) A channel consists of eight sensors, one from each alternating torus bay. Seven sensors must be OPERABLE for the channel to be OPERABLE.

(7) When one of these instruments is INOPERABLE for more than seven days, in lieu of any other report required by Specification 6.6, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next seven days outlining the action taken, the cause of inoperability, and the plans and schedule for restoring the system to OPERABLE status.

(8) With the plant in REACTOR POWER OPERATION, STARTUP CONDITION, HOT STANDBY CONDITION OR HOT SHUTDOWN CONDITION and with the number of OPERABLE channels less than the required OPERABLE channels, either restore the INOPERABLE channel(s) to OPERABLE status within 72 hours, or initiate the preplanned alternate method of monitoring the appropriate parameter.

(9) Noble Gas only

TABLE 4.2.F (Continued)
MINIMUM TEST AND CALIBRATION FREQUENCY FOR SURVEILLANCE INSTRUMENTATION

Instrument Channel	Calibration Frequency	Instrument Check
16) Drywell to Suppression Chamber Differential Pressure	Once/6 months	Each Shift
17) Relief Valve Tailpipe Thermocouple Temperature	N/A	Once/month (24)
18) Acoustic Monitor on Relief Valve Tailpipe	Once/cycle (25)	Once/month (26)
19) High Range Primary Containment Radiation Monitors (RR-90-272CD) (RR-90-273CD)	Once/18 Months (30)	Once/month
20) Suppression Chamber Water Level-Wide Range (LI-64-159A) (XR-64-159)	Once/18 Months	Once/shift
21) Drywell Pressure - Wide Range (PI-64-160A) (XR-64-159)	Once/18 Months	Once/shift
22) Suppression Pool Bulk Temperature (TI-64-161) (TR-64-161) (TI-64-162) (TR-64-162)	Once/18 Months	Once/shift
23) Wide Range Gaseous Effluent Radiation Monitor (RM-90-306)	Once/18 Months	Once/shift

8.	Secondary Containment Leak Rate Testing*	4.7.C.	Within 90 days of completion of each test.
9.	High-Range Primary Containment Radiation Monitors	3.2.F	Within 7 days after 7 days of inoperability.
10.	Wide-Range Gaseous Effluent Radiation Monitors	3.2.F	Within 7 days after 7 days of inoperability.

*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.

ENCLOSURE 2

DESCRIPTION AND JUSTIFICATION
BROWNS FERRY NUCLEAR PLANT (BFN)

REASON FOR CHANGE

The reason for this change is to correct errors in the BFN unit 2 technical specifications as follows:

1) Table 3.2.F (page 3.2/4.2-32), Instrument Number (RR-90-322A) - correct the instrument number, correct typographical error in the Type Indication and Range Column, delete the Iodine and Particulates indication, and to add a footnote 9 to the same instrument.

2) Notes to Table 3.2.F (page 3.2/4.2-33) - correct typographical errors in footnote 7 and to add footnote 9 to the table.

3) Table 4.2.F item 23 (page 3.2/4.2-55) - correct instrument number of RR-90-322A and its description from high range to wide-range.

4) Page 6.0-29 item 6.9.2.10 - correct the word high-range to wide-range.

DESCRIPTION AND JUSTIFICATION FOR THE CHANGE

1) TS- TABLE 3.2.F (page 3.2/4.2.-32) INSTRUMENT RR-90-322A.

A) Existing TS Instrument column currently reads:
RR-90-322A

CHANGE TS Instrument column to read:
"RM-90-306"

JUSTIFICATION- The current Technical Specification lists radiation recorder RR-90-322A as the Wide Range Gaseous Effluent Radiation Monitor (WRGERM). The correct instrument number is RM-90-306. The proposed TS change will correct the subject instrument number in Table 3.2.F to reflect the actual instrument that will be used to perform the required monitoring function.

B) EXISTING TS Table 3.2.F (page 3.2/4.2-32) - Type Indication and Range Column for instrument number RR-90-322A currently reads:
Recorder (Noble Gas 10E-7 - 10E+5 Ci/cc)
(Iodine & Particulates 10E-12 - 10E+2 Ci/cc)

CHANGE TS Type Indication and Range Column for instrument number "RM-90-306" (RR-90-322A) to read:
Recorder (Noble Gas 10E-7 - 10E+5 "μCi/cc")

JUSTIFICATION - A typographical error was identified and is being corrected in range of the noble gas monitors as currently listed. The units currently listed (Ci/cc) would be too high and would not provide the required monitoring range information. This proposed change would reflect the correct range (uCi/cc) of the instrument when monitoring noble gases. In addition, the reference to an iodine and particulate channel in the same column is being deleted. Iodines and particulates are measured by onsite laboratory analyses of particulate and carbon filters installed in the effluent sample line. These analyses are conducted by trained technicians using approved procedures. NUREG 0737 section II.F.1 states that because iodine gaseous effluent monitors for the accident condition are not considered practical at this time, capability for effluent monitoring of radioidines for the accident condition shall be provided with sampling conducted by absorption on charcoal or other media, followed by onsite laboratory analysis. This is consistent with current industry practice. In addition, TVA's response to Regulatory Guide 1.97 dated April 4, 1984 committed BFN to install noble gas monitoring and particulate collection capabilities, not iodine and particulate monitors. This change would provide the consistency between Regulatory Guide 1.97 and current BFN plant configuration.

C) EXISTING TS Table 3.2.F (page 3.2/4.2-32) - NOTES column for instrument RR-90-322A currently reads:
(7)(8)

CHANGE TS Table 3.2.F- Notes Column for instrument number "RM-90-306" (RM-90-322A) to read:
(7)(8)"(9)"

JUSTIFICATION- The addition of footnote (9) to the NOTES column of instrument "RM-90-306" (RR-90-322A) is being added to clarify the function of the subject instrument (Noble Gas only). Footnote (9) will be located in NOTES TO TABLE 3.2.F on page 3.2/4.2-33.

2) EXISTING TS- NOTES TO TABLE 3.2.F (page 3.2/4.2-33) FOOTNOTE 7 currently reads:

(7) When one of these instruments is INOPERABLE for more than seven days, in lieu of any other report required by Specification 6.7.2, prepare and submit a Special Report to the Commission pursuant to Specification 6.7.2, prepare and submit a Special Report to the Commission pursuant to Specification "6.9.2" within the next seven days outlining the action taken, the cause of inoperability, and the plans and schedule for restoring the system to OPERABLE status.

CORRECTIONS TO TS- NOTES TO TABLE 3.2.F (page 3.2/4.2-33) FOOTNOTE 7 is being proposed to read:

(7) When one of these instruments is INOPERABLE for more than seven days, in lieu of any other report required by Specification "6.9.1.4", prepare and submit a Special Report to the Commission pursuant to Specification "6.9.2" within the next seven days outlining the action taken, the cause of inoperability, and the plans and schedule for restoring the system to OPERABLE status.

JUSTIFICATION - The current footnote (7) references Section 6.7.2 and 6.7.3 referenced reporting requirements when the WRGERM became inoperable. These sections were renumbered, in NRC approved amendment 145, dated June 30, 1988, as sections 6.9.1.4 and 6.9.2 respectively. Amendment 145 did not change the working or intent of the reporting requirements for the WRGERM. this proposed change is needed in order to reference the correct section of the current BFN TS.

ADDITION OF FOOTNOTE (9) (page 3.2/4.2-33) - NOTES TO TABLE 3.2.F is being proposed to read:
"(9) Noble Gas Only"

JUSTIFICATION- Adding footnote (9) to the subject table provides clarification of the function of the WRGERM to monitor noble gases only.

3) EXISTING TS- TABLE 4.2.F (page 3.2/4.2-55) ITEM 23, INSTRUMENT CHANNEL Column currently reads:

23) High Range Gaseous Effluent Radiation Monitor (RR-90-322A)

CORRECTION TO TS TABLE 4.2.F (page 3.2/4.2-55) ITEM 23, INSTRUMENT CHANNEL Column is being proposed to read:

23) "Wide" Range Gaseous Effluent Radiation Monitor (RM-90-306)

JUSTIFICATION- The instrument number is being changed to reflect the correct instrument that will be required to meet this TS. The reference to the current Gaseous Effluent Monitor is incorrect. The correct name of the subject monitor is "Wide" Range Gaseous Effluent Radiation Monitor. Therefore, the TS is being changed to provide the proper name of the subject monitor.

4) EXISTING TS 6.9.2.10 (page 6.0-29), the first column currently reads:

9. High-Range Gaseous Effluent Radiation Monitors

CORRECTION TO TS 6.9.2.10 (page 6.0.29), the first column is being proposed to read:

9. "Wide" - Range Gaseous Effluent Radiation Monitors

JUSTIFICATION- This change is proposed in order to correctly reflect the changes in Table 4.2.F item 23 as proposed in number 3 above.

ENCLOSURE 3

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2

DESCRIPTION OF PROPOSED TS AMENDMENT

The proposed amendment would change the BFN Technical Specifications for unit 2 to correct typographical errors in Tables 3.2.F, correct/add footnotes to support the corrections made to Table 3.2.F, and to correct the name of the wide-range gaseous effluent radiation monitors.

Basis for Proposed No Significant Hazards Consideration Determination

NRC has provided standards for determining whether a significant hazards consideration exists as stated in 10CFR50.92(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 of consequences of an accident previously evaluated, or (2) create the possiblility 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) The proposed change does not involve a significant increase in the probability or consequence of any accident previously evaluated. The proposed changes correct typographical errors and nomenclature, provides consistency between Table 3.2.F, Notes to Table 3.2.F, and Table 4.2.F in addition to the other appropriate sections of the TS. These changes are administrative in nature and do not change any safety analysis for which BFN is licensed.

   Removal of the iodine and particulate monitors from table 3.2.F does not significantly increase the probability of an accident. BFN currently has a system installed that meets the NRC requirements of NUREG 0737 item II.F.1, II.F.2, and Regulatory Guide 1.97. In the event of an accident, BFN has one designed release point, the vent stack. Being in compliance with the subject NRC requirements, BFN continuously samples the plant gaseous effluent for postaccident releases of radioactive iodines and particulates. The iodines and particulates are measured through laboratory analysis of particulate and carbon filters.

2) The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. This proposed change does not change any safety related equipment, safety functions, or plant operations. This change does not create any new accident mode or release pathway of radioactive effluents to the environment.

3) The proposed amendment does not involve a significant reduction in a margin of safety. The typographical corrections will provide a more accurate identification and description for Table 3.2.F, Notes for Table 3.2.F, and Table 4.2.F which will assist the plant personnel working with this equipment.

Deletion of the iodine and particulate monitors from Table 3.2.F will not decrease the margin of safety since BFN will continue to sample and analyze the subject filters to determine any quantities of particulates and iodines that may be released. The onsite laboratory equipment, used by trained technicians in accordance with approved procedures, ensures that the analysis can be performed to support the needs of plant and offsite personnel in the event of an accident.

Determination of Basis for Proposed No Significant Hazards

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.