

Enclosure 1

Proposed Technical Specification  
Browns Ferry Nuclear Plant  
Units 1, 2, and 3

(TVA BFN TS 269)

8905240323 890515  
PDR ADOCK 05000259  
P PDC

3.11/4.11 FIRE PROTECTION SYSTEMS

LIMITING CONDITIONS FOR OPERATION

3.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

4. The raw service water storage tank level shall be maintained above level 723'7" by the raw service water pumps.

SURVEILLANCE REQUIREMENTS

4.11.B FIRE PUMPS AND WATER DISTRIBUTION MAINS (Cont'd)

- (3) The pilot cell voltage is greater than or equal to 2.0 volts, and
  - (4) The overall battery voltage is greater than or equal to 24 volts.
- b. At least quarterly by verifying that the specific gravity is appropriate for continued service of the battery.
  - c. At least once per 18 months by verifying that:
    - (1) The batteries, cell plates, and battery racks show no visual indication of physical damage or abnormal deterioration, and
    - (2) Battery terminal connections are clean, tight, free of corrosion and coated with anti-corrosion material.
4. Simulated automatic and manual actuation of raw service water pumps and operation of tank level switches will be conducted annually.

### 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 POWER 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.

\* LCO not applicable until just prior to withdrawing the first control rod for the purpose of making the reactor critical from the unit 2 cycle 5 outage.

#### 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, F,  
and G  
Open: FCO-151  
FCO-152

3.11/4.11 FIRE PROTECTION SYSTEMS

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and G  
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FCO-152

Enclosure 2

DESCRIPTION AND JUSTIFICATION  
BROWNS FERRY NUCLEAR PLANT (BFN)

Reason for Change

BFN units 1, 2, and 3 technical specifications (TS), described below, are being revised to clarify, revise, and update existing Limiting Conditions For Operation (LCO) and Surveillance Requirements (SR) for the control room emergency ventilation system (CREVS) 4.7.E.4 and TS 4.11.B.3.a.(3) Fire Pump Battery Pilot Cell Voltage as follows:

1. SR 4.7.E.4 is being updated to add a CREVS isolation damper which was added by an Design Change Notice.
2. SR 4.11.B.3.a.(3) is being changed to correct an administrative error in the value for the battery pilot cell voltage.

Description and Justification For The Proposed Change

1. EXISTING SR 4.7.E.4 CURRENTLY READS:

. . . , it shall be verified that the following dampers operate as indicated:

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

PROPOSED SR 4.7.E.4 WOULD READ:

. . . , it shall be verified that the following dampers operate as indicated:

Closed: FCO-150 B, D, E, F, and "G"  
Open: FCO-151  
FCO-152

JUSTIFICATION FOR PROPOSED CHANGE SR 4.7.E.4:

BFN Design Change Notice W0143A installed an additional damper, Flow Control Operator (FCO-150G) in the control bay ventilation system. This damper is required to close upon initiation of CREVS. This damper provides additional isolation capability in the CREVS system, and therefore, needs to be included in the TS.

2. EXISTING SR 4.11.B.3.a.(3) CURRENTLY READS:

The pilot cell voltage is greater than or equal to 24 volts, and ...

REVISE SR 4.11.B.3.a.(3) WOULD READ:

The pilot cell voltage is greater than or equal to "2.0" volts, and ...

JUSTIFICATION FOR PROPOSED CHANGE SR 4.11.B.3.a.(3)

The total 3.11/4.11 TS for BFN Fire Protection Systems were revised and submitted to NRC on August 30, 1988. NRC approved the proposed change on December 27, 1988. In that submittal, the incorrect number for the pilot cell voltage for the battery was used. The approved TS referenced that the pilot cell voltage would be equal to or greater than 24 volts. The 24 volts is for the total battery not the pilot cell voltage. The correct value for the pilot cell is 2.0 volts. Actual field performance of surveillance testing has demonstrated that the 2.0 pilot cell voltage is the correct voltage.



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### 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 technical specifications (TS) for units 1, 2, and 3 to administratively revised the pilot cell voltage in 4.11.B.3.a(3). In addition, this proposed amendment would update TS SR 4.7.E.4 to include a newly installed damper in the control room emergency ventilation system.

### BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

NRC 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 of consequences of an accident previously evaluated, or (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. The proposed change does not involve a significant increase in the probability or consequence of any accident previously evaluated. These proposed changes do not change or amend any safety analysis for BFN.

Damper FCO-150G is being added as a result of an Design Change Notice. This damper is required to close upon initiation of the control room emergency ventilation system (CREVS). Adding the damper to the CREVS system assists in the isolation function of the control room in the event of an accident requiring CREVS to operate. The addition of this damper does not invalidate the safety analysis nor bases in which BFN was licensed for.

The battery pilot cell voltage in BFN Surveillance Requirement 4.11.B.3.a(3) is currently 24 volts which is incorrect. The correct value is 2.0 volts. This is an administrative error which was not corrected in the BFN August 30, 1988 submittal. Changing this value is consistent with the current plant configuration which has been verified through surveillance testing. This change does not change the operation of any safety-related equipment. It only corrects an error in order to more accurately reflect the batteries currently installed in the plant.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The addition of the damper FCO-150 G, and changing the pilot cell voltage to 2.0 volts more accurately reflect the current design and operations of BFN. These changes do not create any new accident mode or release pathway of radioactive effluents to the environment.

3. The proposed amendment does not involve any significant reduction in a margin of safety. The proposed amendment brings the technical specifications more in compliance with the actual design and operation of BFN.

The addition of damper FCO-150 G, and changing the pilot cell voltage to read 2.0 volts are administrative in nature. Consistent with 10 CFR 50.36, damper FCO-150 G is being added to the TS. The addition of this additional damper not only reflects the current plant configuration but also provides additional isolation capability for the main control room. This will enhance the overall safety to the main control room operators. Revising the pilot cell voltage brings the current TS in compliance with the physical capabilities of the battery.

These changes provide an overall enhancement to plant safety with proper operation of plant equipment. These changes do not significantly decrease the margin of plant safety.