



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

ENCLOSURE 4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 189 TO FACILITY OPERATING LICENSE NO. DPR-33  
AMENDMENT NO. 204 TO FACILITY OPERATING LICENSE NO. DPR-52  
AMENDMENT NO. 161 TO FACILITY OPERATING LICENSE NO. DPR-68

TENNESSEE VALLEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3

DOCKET NOS. 50-259, 50-260, AND 50-296

1.0 INTRODUCTION

By letters dated January 10 and September 24, 1992, the Tennessee Valley Authority (TVA) submitted a license amendment application to revise the Browns Ferry Nuclear Plant (BFN) Technical Specifications (TS). More specifically, TVA proposed to amend Sections 1.0, 3.2/4.2 and 3.7/4.7 of the BFN TS by removing component lists of containment isolation valves and penetrations, including associated references, in accordance with the guidance of Generic Letter (GL) 91-08, "Removal Of Component Lists From Technical Specifications," dated May 6, 1991.

By removing the lists of primary containment penetrations and isolation valves from TS, including all references made to them in applicable Definitions, Limiting Conditions of Operations (LCOs) and Surveillance Requirements, TVA will be able to institute future changes to these lists without amending its license(s). Once incorporated into plant procedures, any subsequent changes to these particular component lists would be controlled pursuant to the provisions of TS Section 6, "Administrative Controls."

2.0 EVALUATION

TVA proposed to remove Table 3.7.A, "Primary Containment Isolation Valves," from the TS for BFN, Units 1, 2, and 3; and to remove the following Tables from the TS for BFN, Units 1 and 3 (note, these Tables were previously removed from the Unit 2 TS by amendment No. 193 dated March 22, 1991):

- 3.7.B Testable Penetrations With Double O-Ring Seals
- 3.7.C Testable Penetrations With Testable Bellows
- 3.7.D Air Tested Isolation Valves
- 3.7.E Primary Containment Isolation Valves Which Terminate Below The Suppression Pool Water Level

9211240433 921116  
PDR ADOCK 05000259  
P PDR

11



14

.

.

.

.

.

.

.

.

.

3.7.F Primary Containment Isolation Valves Located In Water Sealed Seismic Class Lines

3.7.H Testable Electrical Penetrations

The contents of the above TS Tables (including Table 3.7.A) will be incorporated into the applicable TVA program and procedures, which are then subject to the administrative controls prescribed in Section 6.8, "Procedures/Instructions And Programs," of the BFN TS.

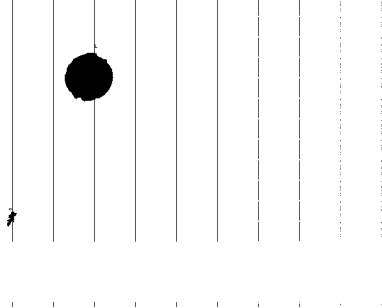
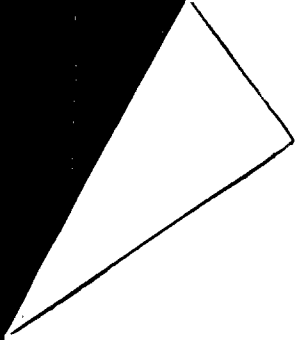
The BASES for TS Section 3.7.D/4.7.D would be revised to identify the Browns Ferry Containment Leak Rate Program and Procedures which now contain a list of all applicable primary containment isolation valves (PCIVs). These BASES would also provide some specific details on the administrative controls that will be put in place before any normally locked and sealed closed PCIVs are allowed to be opened. Furthermore, LCO 3.7.D.1 and Definition 1.0 of TS Section 1.0 would specify that locked or sealed closed valves could be opened on an intermittent basis using administrative controls.

TVA proposed to delete all references to TS Table 3.7.A from the remarks column of TS Tables 3.2.A, "Primary Containment And Reactor Building Isolation Instrumentation," and 3.2.B, "Instrumentation That Initiates Or Controls The Core And Containment Cooling Systems." TVA also proposed to transfer the list of conditions that automatically actuate each PCIV group (i.e., Groups 1 thru 8; except for PCIV Group 7 of Unit 2) from the Notes For Table 3.7.A to Tables 3.2.A or 3.2.B, as applicable. (PCIV Group 7 of Unit 2 was previously deleted from Table 3.7.A and the BASES by TS amendment No. 193 because these particular valves do not perform a containment isolation function. However, TVA decided it would not propose to delete Group 7 from the Unit 1 and 3 TS until the design baseline recovery effort being conducted to return Units 1 and 3 to service was complete.) Furthermore, Item 10 under the Notes For Table 3.2.A and a reference to "Specification 3.7" in the BASES for TS Section 3.2/4.2 would be deleted for consistency.

References to TS Tables 3.7.B through 3.7.F, and 3.7.H, would be deleted from the Surveillance Requirements of TS Section 4.7.A.2.g for Units 1 and 3; these Tables were previously deleted from the Unit 2 TS by amendment No. 193. TVA also proposed to delete all references to Table 3.7.A from the LCO and Surveillance Requirements for PCIVs (i.e., TS Sections 3.7.D.1, 3.7.D.2, and 4.7.D.2). Furthermore, TVA proposed to clarify that the Surveillance Requirements of TS Sections 4.7.D.1.a and b only applied to primary containment isolation valves as opposed to just any isolation valve.

In its letters dated January 10 and September 24, 1992, TVA stated that the aforementioned TS changes for BFN Units 1, 2, and 3 were proposed in accordance with the guidelines of GL 91-08 for removing component lists and applicable references without altering existing TS requirements. Furthermore, TVA confirmed that the TS Tables 3.7.A through 3.7.F, and 3.7.H, will be incorporated into BFN plant procedures for which administrative change controls are subject to the provisions of TS Section 6.0.

TVA addressed specific staff operability concerns regarding the intermittent opening of normally locked or sealed closed PCIVs in its supplemental TS



amendment application dated September 24, 1992. This supplement proposed to incorporate the Standard TS language of GL 91-08 into Definition 1.0.0.1, the BASES of 3.7/4.7, and a footnote of LCO 3.7.D.1.

After reviewing TVA's amendment application, the staff concludes that the proposed TS changes for BFN, Units 1, 2, and 3 are primarily administrative in nature and conform with the guidance of GL 91-08. TVA's proposal to extend the applicability of TS operability and surveillance requirements to all containment penetrations and isolation valves is considered an acceptable alternative to identifying each and every one of these components within the TS. However, TVA will be required to maintain comprehensive listings that specifically identify all TS-required PCIVs and containment penetrations in its plant controlled procedures (e.g., Browns Ferry Containment Leak Rate Program and Procedures). Subsequent changes to these procedures will be subject to the TS provisions of Section 6.0. Consequently, the staff further concludes that TVA's proposed TS changes described in its application of January 10, 1992, as supplemented by letter dated September 24, 1992, do not technically alter the requirements set forth in existing TS and are acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Alabama State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments revise requirements with respect to the use and surveillance of facility components located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that these amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment changes involve no significant hazards consideration, and there has been no public comment on such finding (57 FR 4495). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security, or to the health and safety of the public.

Principal Contributor: Thierry Ross

Date: November 16, 1992

