



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

ENCLOSURE 4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO.188 TO FACILITY OPERATING LICENSE NO. DPR-33
AMENDMENT NO. 203 TO FACILITY OPERATING LICENSE NO. DPR-52
AND AMENDMENT NO.160 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 letter dated April 1, 1992, the Tennessee Valley Authority (TVA) submitted a request for changes to the Browns Ferry Nuclear Plant, Units 1, 2, and 3 Technical Specifications (TS). The requested TS changes would remove the provision of Definition 1.0.LL that limits the combined interval of three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed TS change was provided by Generic Letter (GL) 89-14, dated August 21, 1989.

2.0 EVALUATION

Definition 1.0.LL of the BFN TSs includes a provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. However, Definition 1.0.LL further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval.

Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances.

Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 percent allowance for extending surveillances that are performed on a refueling outage basis.

Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25 percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25 percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff decided that TS changes to remove the 3.25 limit for all surveillances will have an overall positive effect on safety. Furthermore, TVA's proposed changes to Definition 1.0.LL are consistent with the guidance of GL 89-14. Consequently, the staff concludes that the TS amendment application submitted by TVA is 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

These amendments involve a change to a requirement with respect to the use and surveillance requirement of a facility component located within the restricted area as defined in 10 CFR Part 20 and surveillance requirements. The NRC staff has determined that the 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 these amendments involve no significant hazards consideration, and there has been no public comment on such finding (57 FR 22268). Accordingly, these 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 amendments.

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.

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Date: October 19, 1992

