



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

ENCLOSURE 4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 192 TO FACILITY OPERATING LICENSE NO. DPR-33

AMENDMENT NO. 207 TO FACILITY OPERATING LICENSE NO. DPR-52

AMENDMENT NO. 164 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

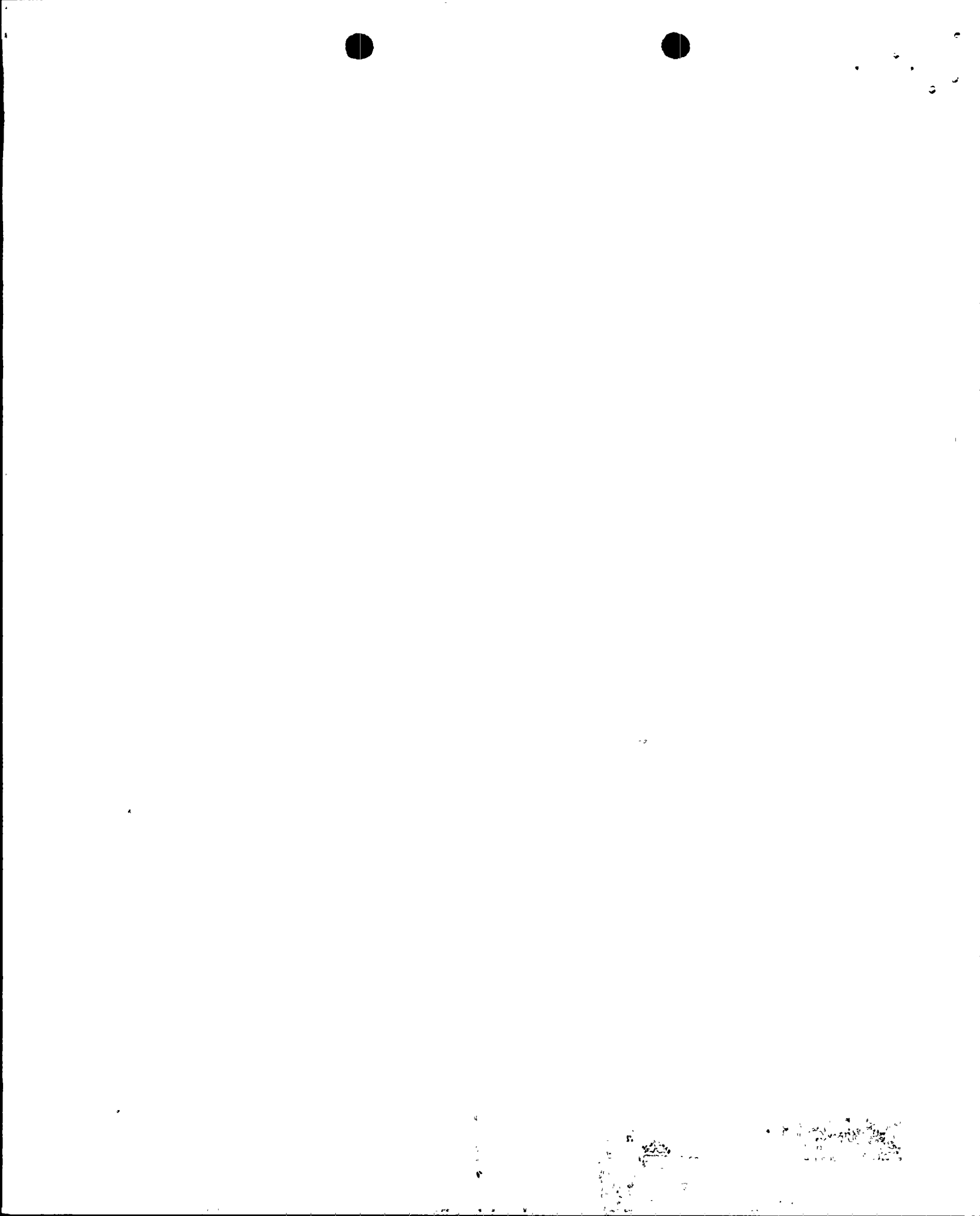
1.0 INTRODUCTION

By letter dated April 13, 1992, as supplemented by letter dated March 19, 1993, the Tennessee Valley Authority (TVA, the licensee) submitted a request for changes to the Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3 Technical Specifications (TS). The March 19, 1993 letter, withdrew a portion of TVA's original TS amendment request. By virtue of this withdrawal, the Unit 2 TS definition NN. for the Appendix R Safe Shutdown Program will remain in the TS. This withdrawal does not change the initial proposed no significant hazards consideration determination. TVA has proposed that the existing license condition on fire protection be replaced with the standard condition noted in Generic Letter (GL) 86-10 and also proposed changes to Section 3.11/4.11 and 6.0 of the BFN TS. The proposed TS changes would relocate requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements from TS to the Fire Protection Program in accordance with the guidelines of GLs 86-10 and 88-12. Furthermore, the proposed TS changes would also modify the administrative control requirements in accordance with the same guidelines to add requirements regarding the Fire Protection Program.

2.0 BACKGROUND

Following the fire at the BFN on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification of Fire Protection Programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by GL 86-10 to incorporate the final NRC-approved Fire Protection Program in their updated Final Safety Analysis Reports (UFSARs). In this manner, the Fire Protection Program -- including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection -- would have a status consistent

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with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition requiring compliance with the provisions of the Fire Protection Program as described in the FSAR, would be used to ensure uniform enhancement of fire protection requirements. Finally, the Commission stated that with the requested actions, licensees may request an amendment to delete the fire protection TS that would now be unnecessary. In this regard the Commission issued GL 88-12 to all licensees with additional guidance on how to remove fire protection requirements from TS.

3.0 EVALUATION

Generic Letters 86-10 and 88-12 recommended the removal of fire protection requirements from the TS. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TS can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, that are presently included in TS and which are relocated by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in TS. At the same time, suitable regulatory controls ensure that there will be careful review and analysis by competent individuals of any changes in the Fire Protection Program including those technical and administrative requirements removed from the TS to ensure that nuclear safety is not adversely affected. These controls include: (1) the applicable administrative controls that remain in TS for the Fire Protection Program; (2) the license condition on implementation of, and subsequent changes to, the Fire Protection Program; and (3) the 10 CFR 50.59 criteria for evaluating changes to the Fire Protection Program as described in the FSAR.

The specific details relating to fire protection requirements to be removed from TS by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements will be modified to include Fire Protection Program implementation as an element for which written procedures must be established, implemented, and maintained. In addition, the responsibilities of the Plant Onsite Review Committee (PORC) would be expanded to include the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Nuclear Safety Review Board (NSRB).

The license and TS changes proposed by TVA for BFN Units 1, 2, and 3 were found to be in accordance with the guidance provided by GLs 86-10 and 88-12, as identified below.

1. Specification 6.5.1.6.p, is added to include as part of PORC's responsibilities, the review of fire protection program implementation and the submittal of recommended changes to the NSRB.
2. Specification 6.2.2.g that prescribes minimum fire brigade staffing is deleted.

3. Specifications in Section 3.11/4.11 Fire Protection Systems, "Limiting Conditions for Operations/Surveillance Requirements" are deleted entirely, including Tables 3.11.A, 3.11.B, 3.11.C, 3.11.D, and associated bases.
4. The standard license condition for implementing and maintaining all provisions of the approved Fire Protection Program is added.
5. Existing license condition (Units 1 and 2 only) related to the March 22, 1975 fire is deleted.
6. Specifications 6.5.1.6.1, 6.5.2.8.h, and 6.8.1.1.f (Unit 2 only) are revised to delete reference to the Appendix R Safe Shutdown Program.
7. License Condition 2.C.(5)(a) (Unit 2 only) regarding the Appendix R Safe Shutdown Program is deleted.
8. Definition NN (Unit 2 only) regarding the Appendix R Safe Shutdown Program is revised to delete reference to License Condition 2.C.(5)(a).

As required by GL 86-10, TVA stated that the NRC-approved Fire Protection Program would be incorporated into the UFSAR. The staff subsequently verified that reference to the BFN Fire Protection Report has been incorporated into Section 10.11 of the BFN UFSAR. The BFN Fire Protection Report constitutes TVA's Fire Protection Program.

TVA confirmed, and the staff verified, that the operational conditions, remedial actions, and surveillance requirements associated with the removed fire protection TS have been included in the BFN Fire Protection Report in accordance with the guidance of GL 88-12. Furthermore, TVA has incorporated the Unit 2 Appendix R Safe Shutdown Program in the BFN Fire Protection Report. Consequently, the TS provisions and License Condition approved for BFN Unit 2 by License Amendment No. 192 dated March 6, 1991, are redundant and no longer necessary (See items 6, 7, and 8 above). However, TS definition NN. was not removed in order to comply with the guidelines of GL 88-12 which states that the specifications related to safe shutdown following a fire that were added per GL 81-12 should be retained.

On the basis of the aforementioned review, the staff concludes that TVA has met the guidance of GL 88-12. Therefore, the staff finds the proposed TS and License Condition changes acceptable.

4.0 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.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR

Part 20 and change surveillance requirements. The amendments relate to changes in recordkeeping, reporting, or administrative procedures or 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 the amendments involve no significant hazards consideration, and there has been no public comment on such finding (57 FR 22270). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). 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.

6.0 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: April 1, 1993