



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENCLOSURE 4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO.210 TO FACILITY OPERATING LICENSE NO. DPR-33

AMENDMENT NO.225 TO FACILITY OPERATING LICENSE NO. DPR-52

AMENDMENT NO.183 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 December 23, 1993, the Tennessee Valley Authority (TVA or the licensee), requested that the Nuclear Regulatory Commission (NRC) approve a change to the Browns Ferry Nuclear Plant (BFN) Units 1, 2 and 3 Technical Specification (TS) 3.6.H/4.6.H, "Snubbers." The requested amendments would revise the schedule for visual inspection of snubbers in response to the guidance provided in the NRC's Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Action." Additionally a minor administrative change to TS 3.6.H. was proposed, wherein the TS would simply state that all safety-related snubbers are listed in Plant Surveillance Instructions rather than referencing the specific surveillance instruction numbers containing this information.

2.0 EVALUATION

TS impose surveillance requirements for visual inspection and functional testing of all safety-related snubbers. A visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable as caused by physical means, leakage, corrosion, or environmental exposure. To verify that a snubber can operate within specific performance limits, the licensee performs functional testing that typically involves removing the snubber and testing it on a specially-designed test stand. Functional testing provides a 95 percent confidence level that 90 percent to 100 percent of the snubbers operate within the specified acceptance limits. The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability.

The TS specifies a schedule for snubber visual inspections that is based upon the number of inoperable snubbers found during the previous visual inspection. The schedules for visual inspections and for the functional testing assume that refueling intervals will not exceed 18 months. Because the current schedule for snubber visual inspections is based only on the number of inoperable snubbers found during the previous visual inspection, regardless of the size of the snubber population, licensees having a large number of snubbers find that the visual inspection schedule is excessively restrictive.

9407120354 940705
PDR ADOCK 05000259
P PDR



Some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual inspection requirements.

To alleviate this situation, in GL 90-09 the NRC staff developed an alternative schedule for visual inspections that maintains the same confidence level as the existing schedule and generally will allow the licensee to perform visual inspections and corrective actions during plant outages. Because this line-item TS improvement will reduce future occupational radiation exposure and is highly cost effective, the alternative inspection schedule is consistent with the Commission's Policy Statement on TS Improvements.

The alternative inspection schedule is based upon the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the snubber populations or categories. A snubber is considered unacceptable if it fails the acceptance criteria of the visual inspection. The alternative inspection interval is based on a fuel cycle of up to 24 months and may be as long as 2 fuel cycles, or 48 months for plants with other fuel cycles, depending on the number of unacceptable snubbers found during the previous visual inspection. The inspection interval may vary by ± 25 percent to coincide with the actual outage.

In its letter dated December 23, 1993, the licensee proposed changes to TS 3.6.H/4.6.H for the snubber visual examination schedule and corresponding changes to the TS Bases. Since the alternative inspection schedule proposed by the licensee is consistent with the guidance provided in GL 90-09, the staff finds the proposed changes 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 change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes the Surveillance Requirements and Bases. 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 (59 FR 27067). 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 amendments.



5.0 CONCLUSION

The Commission has concluded, based upon 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, and (2) such activities will be conducted in compliance with the Commission's regulations, and (3) issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Rajan

Date: July 5, 1994

