

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION  
REVISIONS  
(TVA BFNP TS 176 SUPPLEMENT 1)

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UNIT 1

TABLE 3.7.A  
PRIMARY CONTAINMENT ISOLATION VALVES

| Group | Valve Identification  | Number of Power Operated Valves |          | Maximum Operating Time (sec.) | Normal Position | Action on Initiating Signal |
|-------|---|---------------------------------|----------|-------------------------------|-----------------|-----------------------------|
|       |   | Inboard                         | Outboard |                               |                 |                             |
| 1     | Main steamline isolation valves (PCV-1-14, 26, 37, 65; 1-15, 27, 38, & 52)      | 4                               | 4        | 3 < T < 5                     | 0               | GC                          |
| 1     | Main steamline drain isolation valves PCV-1-55 & 1-56                           | 1                               | 1        | 15                            | C               | SC                          |
| 1 *   | Reactor Water sample line isolation valves                                      | 1                               | 1        | 5                             | C               | SC                          |
| 2     | RHRS shutdown cooling supply isolation valves FCV-74-48 & 47                    | 1                               | 1        | 40                            | C               | SC                          |
| 2     | RHRS - LPCI to reactor FCV-74-53, 67  |                                 | 2        | 30                            | C               | SC                          |
| 2     | Reactor vessel head spray isolation valves FCV-74-77, 78                        | 1                               | 1        | 30                            | C               | SC                          |
| 2     | RHRS flush and drain vent to suppression chamber<br>FCV-74-102, 103, 119, & 120 |                                 | 4        | 20                            | C               | SC                          |
| 2     | Suppression Chamber Drain<br>FCV 75-57, -58                                     |                                 | 2        | 15                            | C               | SC                          |
| 2     | Drywell equipment drain discharge isolation valves PCV-77-15A, & 15B            |                                 | 2        | 15                            | 0               | GC                          |
| 2     | Drywell floor drain discharge isolation valves FCV-77-2A & 2B                   |                                 | 2        | 15                            | 0               | GC                          |

\*These valves isolate only on reactor vessel low low water level (470") and main steam line high radiation of Group 1 isolations.

TABLE 3.7.A (Continued)

| Group | Valve Identification   | Number of Power Operated Valves |                  | Maximum Operating Time (sec.) | Normal Position | Action on Initiating Signal |
|-------|--|---------------------------------|------------------|-------------------------------|-----------------|-----------------------------|
|       |  | Inboard                         | Outboard         |                               |                 |                             |
| 6     | Suppression Chamber purge inlet (FCV-64-19)  |                                 | 1                | 2.5                           | C               | SC                          |
| 6     | Drywell/Suppression Chamber nitrogen purge inlet (FCV-76-17)                         |                                 | 1                | 5                             | C               | SC                          |
| 6     | Drywell Exhaust Valve Bypass to Standby Gas Treatment System (FCV-64-31)             |                                 | 1                | 5                             | O               | GC                          |
| 6     | Suppression Chamber Exhaust Valve Bypass to Standby Gas Treatment System (FCV-64-34) |                                 | 1                | 5                             | O               | GC                          |
| 6     | Drywell/Suppression Chamber Nitrogen Purge Inlet (FCV-76-24)                         |                                 | 1                | 5                             | C               | SC                          |
| 6     | System Suction Isolation Valves to Air Compressors "A" and "B" (FCV-32-62, 63)       |                                 | 2                | 15                            | O               | GC                          |
| 7     | RCIC Steamline Drain (FCV-71-6A, 6B)   |                                 | 2                | 5                             | O               | GC                          |
| 7     | RCIC Condensate Pump Drain (FCV-71-7A, 7B)   |                                 | 2                | 5                             | C               | SC                          |
| 7     | HPCI Hotwell pump discharge isolation valves (FCV-73-17A, 17B)                       |                                 | 2                | 5                             | C               | SC                          |
| 7     | HPCI steamline drain (FCV 73-6A, -6B)  |                                 | 2                | 5                             | O               | GC                          |
| 8     | TIP Guide Tubes (5)  |                                 | 1 per guide tube | NA                            | C               | GC                          |

6.0 ADMINISTRATIVE CONTROLS

- g. All written reports requiring 24-hour notification to the Commission.
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meeting minutes of the PORC.

8. AUDITS

Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass.

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Site Radiological Emergency Plan and implementing procedures at least once per 24 months.
- f. The Plant Physical Security Plan and implementing procedures at least once per 12 months.
- g. Any other area of unit operation considered appropriate by the NSRB or the Manager of Power.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

## 6.0 ADMINISTRATIVE CONTROLS

### 4. Duties and Responsibilities

The PORC serves in an advisory capacity to the plant superintendent and as an investigating and reporting body to the Nuclear Safety Review Board in matters related to safety in plant operations. The plant superintendent has the final responsibility in determining the matters that should be referred to the Nuclear Safety Review Board.

The responsibility of the committee will include:

- a. Review all standard and emergency operating and maintenance instructions and any proposed revisions thereto, with principal attention to provisions for safe operation.
- b. Review proposed changes to the Technical Specifications.
- c. Review proposed changes to equipment or systems having safety significance, or which may constitute "an unreviewed safety question," pursuant to 10 CFR 50.59.
- d. Investigate reported or suspected incidents involving safety questions, violations of the Technical Specifications, and violations of plant instructions pertinent to nuclear safety.
- e. Review reportable occurrences, unusual events, operating anomalies and abnormal performance of plant equipment.
- f. Maintain a general surveillance of plant activities to identify possible safety hazards.
- g. Review plans for special fuel handling, plant maintenance, operations, and tests or experiments which may involve special safety considerations, and the results thereof, where applicable.
- h. (deleted)
- i. Review implementing procedures of the Radiological Emergency Plan and the Industrial Security Program on an annual basis.

UNIT 2

9.0 ADMINISTRATIVE CONTROLS

- g. All written reports requiring 24-hour notification to the Commission.
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UNIT 3

TABLE 3.7.A  
PRIMARY CONTAINMENT ISOLATION VALVES

| Group | Valve Identification   | Number of Power Operated Valves |          | Maximum Operating Time (sec.) | Normal Position | Action on Initiating Signal |
|-------|--|---------------------------------|----------|-------------------------------|-----------------|-----------------------------|
|       |  | Inboard                         | Outboard |                               |                 |                             |
| 1     | Main steamline isolation valves (PCV-1-14, 26, 37, & 51; 1-15, 27, 38 & 52)    | 4                               | 4        | 3 < T < 5                     | 0               | GC                          |
| 1     | Main steamline drain isolation valves (PCV-1-55 & 1-56)                        | 1                               | 1        | 15                            | 0               | GC                          |
| 1 *   | Reactor water sample line isolation valves                                     | 1                               | 1        | 5                             | C               | SC                          |
| 2     | RHRS shutdown cooling supply isolation valves (PCV-74-48 & 47)                 | 1                               | 1        | 10                            | C               | SC                          |
| 2     | RHRS - LPCI to reactor (PCV-74-53 & 67)  |                                 | 2        | 30                            | C               | SC                          |
| 2     | Reactor vessel head spray isolation valves (PCV-74-77 & 78)                    | 1                               | 1        | 30                            | C               | SC                          |
| 2     | RHRS flush and drain vent to suppression chamber (PCV-74-102, 103, 119, & 120) |                                 | 4        | 20                            | C               | SC                          |
| 2     | Suppression Chamber Drain (PCV-75-57 & 58)                                     |                                 | 2        | 15                            | C               | SC                          |
| 2     | Drywell equipment drain discharge isolation valves (PCV-77-15A & 15B)          |                                 | 2        | 15                            | 0               | GC                          |
| 2     | Drywell floor drain discharge isolation valves (PCV-77-2A & 2B)                |                                 | 2        | 15                            | 0               | GC                          |

\*These valves isolate only on reactor vessel low low water level (470") and main steam line high radiation of Group 1 isolations.

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|-------|--|---------------------------------|----------|-------------------------------|-----------------|-----------------------------|
|       |  | Inboard                         | Outboard |                               |                 |                             |
| 6     | Suppression Chamber purge inlet (FCV-64-19)  |                                 | 1        | 2.5                           | C               | SC                          |
| 6     | Drywell/Suppression Chamber nitrogen purge inlet (FCV-76-17)                         |                                 | 1        | 5                             | C               | SC                          |
| 6     | Drywell Exhaust Valve Bypass to Standby Gas Treatment System (FCV-64-31)             |                                 | 1        | 5                             | 0               | GC                          |
| 6     | Suppression Chamber Exhaust Valve Bypass to Standby Gas Treatment System (FCV-64-34) |                                 | 1        | 5                             | 0               | GC                          |
| 6     | System Suction Isolation Valves to Air Compressors "A" and "B" (FCV-32-62, 63)       |                                 | 2        | 15                            | 0               | GC                          |
| 6     | Drywell/Suppression Chamber Nitrogen Purge Inlet (FCV-76-24)                         |                                 | 1        | 5                             | C               | SC                          |
| 6     | Torus Hydrogen Sample Line Valves Analyzer A (FSV-76-55, 56)                         |                                 | 2        | NA                            | Note 1          | SC                          |
| 6     | Torus Oxygen Sample Line Valves Analyzer A (FSV-76-53, 54)                           |                                 | 2        | NA                            | Note 1          | SC                          |
| 6     | Drywell Hydrogen Sample Line Valves Analyzer A (FSV-76-49, 50)                       | 1                               | 1        | NA                            | Note 1          | SC                          |
| 6     | Drywell Oxygen Sample Line Valves Analyzer A (FSV-76-51, 52)                         | 1                               | 1        | NA                            | Note 1          | SC                          |
| 6     | Sample Return Valves - Analyzer A (FSV-76-57, 58)                                    |                                 | 2        | NA                            | 0               | GC                          |
| 6     | Torus Hydrogen Sample Line Valves Analyzer B (FSV-76-65, 66)                         |                                 | 2        | NA                            | Note 1          | SC                          |

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ENCLOSURE 2

DESCRIPTION AND JUSTIFICATION  
TVA BFNP TS 176 SUPPLEMENT 1

(Reference: TVA letter from L. M. Mills to H. R. Denton  
dated September 14, 1982 (TVA BFNP TS 176))

Unit 1 - page 250

Unit 3 - page 262

One of the proposed changes to this page is the addition of the following footnote to reactor water sample line isolation valves: "These valves isolate only on reactor vessel low low water level (470") and main steam line high radiation of Group 1 isolations."

This change is for clarification only. The footnote has been added to more accurately represent the isolation trips for these valves. It does not change the intent of the technical specifications and does not degrade the safety of the plant.

NOTE: This proposed revision for unit 2 was made in the unit 2 reload 4 submittal (TVA BFNP TS 179).

The other proposed revision to page 250 of unit 1 was previously made in TS 176 (see reference). It is proposed to change "FCV 74-57,-58" to "FCV 75-57,-58." This corrects a typographical error.

Unit 1 - page 252

Unit 3 - page 264

1. It is proposed to change the "Normal Position" of the drywell exhaust valve bypass to SBT system (FCV 64-31) and the suppression chamber exhaust valve bypass to SBT system (FCV 64-34) from normally closed to normally open.

The drywell to torus  $\Delta P$  compressor was installed to reduce the consequences of the upward and downward loads on the torus during the initial vent clearing phenomena of a LOCA event. In order for the  $\Delta P$  compressor to function as designed, valves FCV 64-31 and FCV 64-34 must be open. Apparently Table 3.7.A of the technical specifications and section 7.3 of the FSAR failed to get revised to reflect this modification. Plant safety is not reduced by making valves FCV 64-31 and 64-34 normally open since these are PCIS valves and will close upon receipt of isolation signal. This change will permit the drywell to torus  $\Delta P$  compressor to function as designed and will increase plant safety.

NOTE: This proposed change for unit 2 was made in the unit 2 reload 4 submittal (TVA BFNP TS 176).

2. Change "Normal Position" of FCV 71-7A,7B from "O" to "C" and change "Action on Initiating Signal" from "GC" to "SC." The normal position of these valves is closed.
3. Change "FCV 75-57,58" to "FCV 73-6A,6B." These valve numbers were incorrectly placed in the table.

Proposed changes 2 and 3 were proposed first in TVA BFNP TS 176.

Units 1 and 3 - page 334

Unit 3 - page 364

It is proposed to change specification 6.2.A.8.f to reflect a 12-month audit cycle for plant physical security plan and implementing procedures. NRC Inspection Report 50-259/82-20, -260/82-20, -296/82-20, Item 10, outlined the various sources which require an audit of the physical security program every 12 months, including 10 CFR 73.55, 10 CFR 50.45(p), and the Browns Ferry Physical Security Plan. It is proposed to change this specification to be consistent with these other regulatory requirements.

There will be no effect on plant safety as a result of this change. This change makes the audit cycle more conservative than the current technical specification requirements of 24 months.

Units 1 and 2 - page 336

Unit 3 - Page 366

It is proposed to delete the requirement of Appendix A specification 6.2.B.4.h to have the Plant Operations Review Committee (PORC) review the QA program. The adequacy of the quality assurance program is charged to the Manager, Quality Assurance and Audit Staff, by Section 17.2.1.1.3.d of TVA-TR75-1, Revision 5. The program is audited (Section 17.2.1.1.3) and reviewed (Section 17.2.1.1.3.2.e) and the status checked (Section 17.2.1.1.3.3.d) by members of his organization. Additionally, the NUC PR Chief, Quality Assurance and Compliance Branch is responsible for performing an annual review of the status and adequacy of the operational quality assurance program and reporting the results to the Director of Nuclear Power and the Manager, Quality Assurance and Audit Staff (Section 17.2.1.1.6). Technical specifications require the NSRB to biyearly review the quality assurance program for compliance with the requirements of Appendix B, 10 CFR 50, and annually review for compliance with Regulatory Guide 4.15. PORC review is an unnecessary redundancy.