

ENCLOSURE

PROPOSED TECHNICAL SPECIFICATION REVISIONS
BROWN'S FERRY NUCLEAR PLANT UNITS 1, 2, AND 3
(TVA BFNP TS 185)

UNIT 1
PROPOSED CHANGES

3.0 DESIGN FEATURES AND OPERATING PRACTICES

This section describes those design and operating practices not covered in Section 2.0, "Limiting Conditions for Operations" and which, if changed, could result in significant effects on environmental impacts.

1.0 Definitions

The following terms are defined for uniform interpretation of these specifications.

Administrative Terminology

Unusual event with the potential for a significant environmental impact-- and event that results in noncompliance with an environmental technical specification, or an event that results in uncontrolled or unplanned release of radioactive discharges from the Browns Ferry Nuclear Plant in excess of applicable Federal, state, and local regulations.

Instrumentation Properties

Accuracy-- a measure of the difference between the true and measured values of a given parameter, hence a measure of error.

Minimum detectable level--that level below which a specific detector, instrument, or analysis is unable to detect the presence of a given constituent.

Sensitivity--the minimum change in the variable detected by a given sensor.

3.2 Land Management

3.3 Onsite Meteorological Monitoring

The onsite meteorological monitoring program measures and documents meteorological conditions at the site, specifically at heights above ground that allow reasonable estimates of atmospheric dispersion conditions for airborne plant effluents. The onsite program shall conform to the recommendations and intent of Regulatory Guide 1.23, Onsite Meteorological Programs (February 1972), and include instruments to sense wind speed and direction at 10m, 46m, and 91m; to allow calculation of vertical temperature gradient between 10m and 46m and between 10m and 91m and to measure ambient temperature and dew point at 10m. The location of the meteorological tower is as specified in Section 2.3.7 of the Browns Ferry Nuclear Plant Final Safety Analysis Report (see Amendment 63). A quality assurance program shall be in effect for all meteorological measurements and observations.

(f) Fish Impingement on Intake Screens

5.0 ADMINISTRATIVE CONTROLS

Objective

This section describes the administrative and management controls established to provide continuing protection to the environment and to implement the environmental Technical Specifications. Measures to be specified in this section include the assignment of responsibilities, organizational structure, operating procedures, review and audit functions, and reporting requirements.

Specifications

5.1 Responsibility

5.1.1 The power plant superintendent has responsibility for operating the plant in compliance with these Technical Specifications.

5.1.2

The Chief, Radiological Hygiene Branch, is responsible for the radiological monitoring program outside the plant.

5.2 Organization

5.2.1 The organization of TVA management which directly relates to operation of the plant is shown on Figure 5.2-1.

5.2.2 The principal organizations within TVA which are concerned with environmental matters related to nuclear power plant operations are the Office of Power, Office of Natural Resources, and the Office of Health and Safety. The Office of Power is directly responsible for operating the plant in accordance with specified requirements and conducting onsite monitoring. The Office of Natural Resources and the Office of Health and Safety are responsible for providing technical guidance, assistance monitoring, and other services as needed for environmental compliance. The organizations above report to the General Manager as shown in Figure 5.2.1.

5.3 Review and Audit

5.3.1 The Office of Power Quality Assurance and Audit Staff shall ensure that a periodic audit of the environmental monitoring program is conducted at least once per calendar year.

5.3.2 The Office of Power Regulatory Staff conducts a review of the following items:

- a. Preparation of the proposed environmental Technical Specifications.
- b. Coordination of environmental Technical Specification development with the safety Technical Specifications to avoid conflicts and maintain consistency.
- c. Proposed changes to the Environmental Technical Specifications and the evaluated impact of the change.
- d. Proposed written procedures, as described in Section 5.5 and proposed changes thereto which could significantly affect the plant's environmental impact.
- e. Proposed changes or modifications to plant systems or equipment which could significantly affect the plant's environmental impact and the evaluated impact of the changes.
- f. Results of the environmental monitoring programs prior to their submittal in each Annual Operating Report. See sections 5.6.1 and 5.6.2.
- g. Reported instances of violations of environmental technical specifications. Where investigation indicates, evaluation and formulation of recommendations to prevent recurrence.

5.4 Action to be Taken if an Environmental LCO is Exceeded

5.5 Procedures

5.5.1

- 5.5.2 Detailed written procedures for the environmental monitoring program outside the plant, including check-off lists, where applicable, shall be prepared, receive appropriate administrative approval and be adhered to.

A quality control program for the radiological environmental monitoring program has been established with the Alabama Department of Public Health Administration Laboratory and the Environmental Protection Agency, Montgomery, Alabama. Samples of air, water, milk, and vegetation collected around the BFPN are forwarded to these laboratories for analysis; and results are exchanged for comparison.

An internal quality control program for the radiological environmental monitoring program is being conducted whereby roughly one tenth of all samples are analyzed in duplicate. A quality control program is conducted with the Environmental Protection Agency in Las Vegas in which spiked samples are analyzed and the results compared.

5.5.3

5.6 Reporting Requirements

5.6.1

5.6.2 Routine Reporting

a.

b. Radiological Environmental Monitoring

Routine Reporting

1. TVA shall prepare a report entitled "Environmental Radioactivity Levels - Browns Ferry Nuclear Plant - Annual Report." The report shall cover the previous 12 months of operation and shall be submitted to the Director of the NRC Region II Office (with a copy to the Director, Office of Nuclear Reactor Regulation) within 120 days after January 1 of each year. The report format shown in Regulatory Guide 4.8 Title 1 shall be used. The report shall include summaries, interpretations, and evaluations of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies and/or operational controls (as appropriate), and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of irreversible damage are detected by the monitoring, the licensee shall provide an analysis of the problem and a proposed course of action to alleviate the problem.

5. If such levels as discussed in 5.6.3(a)3 and 5.6.3(a)4 can be definitely shown to result from sources other than the Browns Ferry Nuclear Plant, the reporting action called for in 5.6.3(a)3 and 5.6.3(a)4 need not be taken. Justification for assigning high levels of radioactivity to sources other than the Browns Ferry Nuclear Plant must be provided in the annual report.

c. Changes

1. Where a change to the plant design, the plant operation, or to procedures is planned which could have a significant adverse effect on the environment or which involves an environmental matter or question not previously reviewed and evaluated by the NRC, a request for the change shall be made to the NRC before implementation.

3. Requests for changes in environmental technical specifications shall be submitted to the Director, Division of Licensing, USNRC, for prior review and authorization.

5.7 Environmental Records

5.7.1 Operational information concerning the inplant portion of the environmental technical specifications shall be kept by DNF in a manner convenient for review. This includes plant records and/or logs as indicated below:

- a. Related plant operations
- b. Related maintenance activities
- c.
- d. Updated, corrected, and as-built drawings of the plant

Item (a) through (c) above shall be retained for a period of at least six years and item (d) shall be retained for the life of the plant.

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UNIT 2

PROPOSED CHANGES

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