



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

March 7, 1995

TVA-BFN-TS-350
TVA-SQN-TS 94-12

10 CFR 50.90
10 CFR 50.54(a)(3)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

In the Matter of)
Tennessee Valley Authority)

Docket Nos. 50-259
50-260
50-296
50-327
50-328

REVISION TO SUBMITTAL FOR BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 - TECHNICAL SPECIFICATION (TS) NO. 350 - SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2 - TECHNICAL SPECIFICATION (TS) NO. 94-12 - NUCLEAR QUALITY ASSURANCE (NQA) PLAN - TVA-NQA-PLN89

In accordance with the provisions of 10 CFR 50.54 and 50.90, TVA is resubmitting a request for an amendment (TS-350) to licenses DPR-33, DPR-52, and DPR-68 to change the BFN TSs for Units 1, 2, and 3 and amendment (TS-94-12) to licenses DPR-77 and DPR-79 to change the SQN TSs for Units 1 and 2.

This resubmittal is based on a conversation with NRC personnel on January 30, 1995. In that conversation, NRC requested that TVA revise the submittal of November 15, 1994, amending BFN's and SQN's technical specifications. As a result, TVA is retaining the fire protection-related audit frequencies, based on NRC's position that the audit requirements are presently defined in Generic Letter 82-21, "TECHNICAL SPECIFICATIONS FOR FIRE PROTECTION AUDITS," and that these requirements must be maintained. Additionally, TVA is deleting the request for a 25-percent grace period based on NRC's position that this is not acceptable for audit-related activities.

The enclosures contained in this submittal will replace the enclosures in the November 15, 1994, amendment request in their entirety. The "No Significant Hazards analysis" and the "Environmental Impact Statement" are included in this submittal but have not been revised as a result of the changes described above.

The proposed changes will delete the audit frequencies from the TSs, with the exception of the fire protection-related audits. Also, the requirement to perform the Radiological Emergency Plan and Security Plan audits has been deleted from the TS. As a result, the revised audit frequencies will be governed by the Radiological Emergency and Security Plans. Enclosure 1 identifies the TS proposed changes (marked pages) for BFN and Enclosure 3 identifies the proposed changes for SQN. Enclosure 6 provides the revised pages for BFN.

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U.S. Nuclear Regulatory Commission
Page 2
March 7, 1995

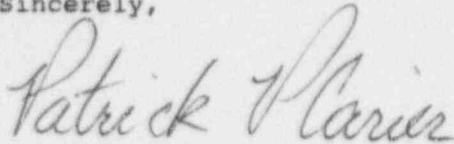
The proposed changes have been reviewed and approved by each Plant Operations Review Committee and the Nuclear Safety Review Board. The justification for the proposed TS change and a proposed determination of no significant hazards consideration performed pursuant to 10 CFR 50.92 are provided in Enclosures 2 and 4. Revisions to Enclosures 2 and 4 are identified by revision bars. Enclosure 5 is provided to illustrate TVA's method for implementing the audit frequencies in the NQA plan, TVA-NQA-PLN89, along with justification for these changes. The NQA plan revision will be incorporated as an addendum to the plan following NRC's approval of the requested TS revision. TVA notes that changes similar to those proposed herein have been approved by the NRC for Virginia Power Company in a Safety Evaluation Report dated March 1, 1994.

In response to the NRC Cost Beneficial Licensing Action initiative, TVA estimates the proposed changes would yield a cost savings as high as \$46,000 per year at each site. Savings over the life of the sites are estimated to be \$2,116,000.

This amendment application also satisfies the requirements of 10 CFR 50.54(a)(3) which requires that changes to the NQA Plan that reduce commitments be submitted for NRC approval prior to implementation. TVA requests a 45-day implementation period for this TS change following issuance.

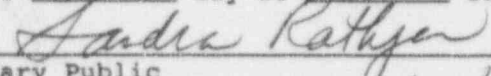
Please direct questions concerning this issue to D. V. Whaley at (615) 751-7009.

Sincerely,



Patrick P. Carrier
Manager
Corporate Licensing

Sworn to and subscribed to before me
this 8th day of March 1995


Notary Public

My Commission Expires 2/18/96

Enclosures
cc: See page 3

U.S. Nuclear Regulatory Commission
Page 3
March 7, 1995

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cc: Continued on page 4

U.S. Nuclear Regulatory Commission
Page 4
March 7, 1995

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