



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609

September 13, 1995

TVA-BFN-TS-368

10 CFR 50.90

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

Gentlemen:

In the Matter of )  
Tennessee Valley Authority )

Docket No. 50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) - UNIT 3 - TECHNICAL  
SPECIFICATION (TS) 368 - ADMINISTRATIVE CHANGES TO TS TABLES  
4.2.B AND 4.2.C**

In accordance with the provisions of 10 CFR 50.4 and 50.90, TVA is submitting a request for an amendment (TS-368) to license DPR-68 to change the TSS for Unit 3. The proposed changes are administrative changes to Unit 3 TS Tables 4.2.B and 4.2.C. The change to TS Table 4.2.B deletes the requirement to perform daily instrument checks for the Steam Supply Low Pressure and Turbine Exhaust Diaphragm High Pressure for both the Reactor Core Isolation Cooling and High Pressure Coolant Injection systems. The pressure switches that perform these functions do not have indications; therefore, instrument checks are not appropriate. This change was previously approved for Unit 2 in TS Amendment No. 167 (TS-263). Additionally, a typographical error in Table 4.2.C is being corrected for the Source Range Monitor (SRM) Upscale function.

TVA has determined that there are no significant hazards considerations associated with the proposed change and that the change is exempt from environmental review pursuant to

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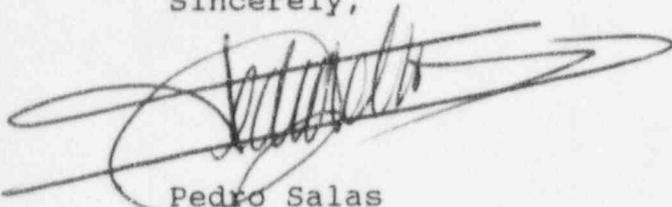
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the provisions of 10 CFR 51.22(c)(9). The BFN Plant Operations Review Committee and the BFN Nuclear Safety Review Board have reviewed this proposed change and determined that operation of BFN Unit 3 in accordance with the proposed change will not endanger the health and safety of the public. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosures to the Alabama State Department of Public Health.

Enclosure 1 to this letter provides the description and evaluation of the proposed change. This includes TVA's determination that the proposed change does not involve a significant hazards consideration, and is exempt from environmental review. Enclosure 2 contains copies of the appropriate TS pages from Unit 3 marked-up to show the proposed change. Enclosure 3 forwards the revised TS pages for Unit 3 which incorporate the proposed change.

TVA requests that the revised TSs be approved prior to the restart of Unit 3 (currently scheduled for November 1995) in order to avoid the need to perform the unnecessary instrument checks and to avoid confusion for the SRM Upscale function. If you have any questions about this change, please telephone me at (205) 729-2636.

Sincerely,



Pedro Salas  
Manager of Site Licensing

Enclosures  
cc: See page 3

Subscribed and sworn to before me  
on this 13th day of September 1995.

Barbara A. Blanton  
Notary Public

My Commission Expires 10/06/98  
My Commission Expires \_\_\_\_\_

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cc (Enclosures):

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT (BFN)  
UNIT 3

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-368  
DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

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I. DESCRIPTION OF THE PROPOSED CHANGE

TVA is revising Unit 3 TS Table 4.2.B, "Surveillance Requirements for Instrumentation that Initiate or Control the CSCS," to delete the requirement to perform daily instrument checks for certain instrument channels associated with the Reactor Core Isolation Cooling (RCIC) and High Pressure Coolant Injection (HPCI) systems. This requirement was incorrectly added by a previous TS change. The affected instrument channels are the RCIC Steam Supply Low Pressure, RCIC Turbine Exhaust Diaphragm High Pressure, HPCI Steam Supply Low Pressure, and HPCI Turbine Exhaust Diaphragm High Pressure.

Additionally, Table 4.2.C, "Surveillance Requirements for Instrumentation that Initiate Rod Blocks," is being revised to correct a typographical error for the Source Range Monitor (SRM) Upscale function. The functional test for the SRM Upscale incorrectly references note 15 instead of the correct note 13. The specific changes are described below.

1. Unit 3 TS Table 4.2.B, pages 3.2/4.2-45 and 46.

<u>Function</u>	<u>Instrument Check</u>	
	<u>Existing</u>	<u>Proposed</u>
Instrument Channel - RCIC Steam Supply Low Pressure	once/day	none
Instrument Channel - RCIC Turbine Exhaust Diaphragm High Pressure	once/day	none
...		
Instrument Channel - HPCI Steam Supply Low Pressure	once/day	none
Instrument Channel - HPCI Turbine Exhaust Diaphragm High Pressure	once/day	none

2. TS Table 4.2.C, page 3.2/4.2-49.

<u>Function</u>	<u>Functional Test</u>		
	<u>Existing</u>		<u>Proposed</u>
SRM Upscale	(1)(2)	(15)	(1)(2) (13)

## II. REASON FOR THE PROPOSED CHANGE

The proposed change to TS Table 4.2.B deletes the requirement for instrument checks for instrumentation used to trip and isolate the RCIC and HPCI systems on either low steam supply pressure or high turbine exhaust pressure. These instrument channels consist of Static O-ring pressure switches that include no method of indication. Thus, the performance of instrument checks is not appropriate.

The requirement for a daily instrument check for these instrument channels had been added in error by TS-243 (submitted June 13, 1988). That TS change added the instrument channels for the RCIC and HPCI steam supply low pressure and turbine exhaust diaphragm high pressure to TS Tables 3.2.B and 4.2.B for Units 1, 2, and 3. The proposed surveillance requirements included daily instrument checks. TS-243 was issued on September 23, 1988 (Amendments Nos. 155, 151, 126).

Following issuance of TS-243, TVA identified that this instrumentation did not include indicators. TS-263 was subsequently submitted on February 24, 1989 and included the deletion of the requirements for daily instrument checks for the Unit 2 TS. However, a TS change to resolve this discrepancy for Unit 3 was not submitted. TS-263 was issued on July 7, 1989 (Amendment No. 167).

BFN Units 1, 2, and 3 were in an extended outage during these TS revisions. TS-263, which corrected the Unit 2 TS surveillance requirements, was issued prior to Unit 2 startup.

The change to Table 4.2.C corrects a typographical error made during the retyping and reformatting of the TSS that occurred in 1987. The SRM Upscale functional test incorrectly references note 15 (Flow Bias Comparator). The correct reference should be note 13. This note is correctly referenced in previous revisions to Unit 3 TS Table 4.2.C and in the current TSS for Units 1 and 2.

### III. SAFETY ANALYSIS

The proposed changes to TS Tables 4.2.B and 4.2.C are administrative changes to correct errors and provide consistency in the BFN TSSs.

The proposed change to Table 4.2.B corrects an error introduced during a previous TS change. That TS change added the requirement to perform instrument checks for pressure switches. This error has been previously corrected for Unit 2. As defined by TS, an instrument check is a qualitative determination of acceptable Operability by observation of instrument behavior during operation. The pressure switches associated with these RCIC and HPCI instrument channels have no indication function; therefore, an instrument check is not appropriate. These instruments are functionally tested once per 31 days and calibration tests are performed once per 18 months as required by TS surveillance requirements. This required testing verifies the operability of these instrument channels.

The change to Table 4.2.C corrects a typographical error that was introduced during earlier retyping and reformatting of the Unit 3 TS. This change correctly references the functional test of the SRM Upscale function to note 13 instead of note 15.

### IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TVA has concluded that operation of Browns Ferry Nuclear Plant Unit 3 in accordance with the proposed change to the technical specifications does not involve a significant hazards consideration. TVA's conclusion is based on its evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

- A. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes are administrative in nature and correct errors that were introduced by previous changes to the TSSs. These changes do not affect any of the design basis accidents nor do they involve an increase in the probability or consequences of an accident previously evaluated.

- B. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes are administrative in nature. These changes do not change the operation or function

of the affected instrumentation. The deletion of the RCIC and HPCI instrument checks reflects the actual installed configuration of this instrumentation (no indication) and the change to Table 4.2.C corrects the referenced note for the SRM Upscale function. Therefore, the possibility for an accident or malfunction of a different type than any evaluated previously is not created by this change.

- C. The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed changes are administrative in nature. The proposed changes to TS Tables 4.2.B and 4.2.C do not affect any acceptable limit of operation, instrument setpoint, or analysis assumption in the TS or Bases. Therefore, this change does not reduce the margin of safety as defined in the basis for any TS.

#### V. ENVIRONMENTAL IMPACT CONSIDERATION

The proposed change does not involve a significant hazards consideration, a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or a significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT (BFN)  
UNIT 3

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-368  
MARKED PAGES

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I. AFFECTED PAGE LIST

Unit 3

3.2/4.2-45

3.2/4.2-46

3.2/4.2-49

II. MARKED PAGES

See attached.