

9/15/53

Note to: R. Clark

From: J. Gray

SUBJECT: PROPOSED NOTICE FOR BROWNS FERRY-1 AMENDMENTS FOR RELOAD AND TO REFLECT MODIFICATIONS MADE DURING CURRENT REFUELING OUTAGE

OELD has been asked to concur in a proposed notice for license amendments made necessary by the Cycle 6 reload and by plant modifications undertaken during the current refueling outage. Based on my review of the 10-page notice, I believe that a number of changes are needed for the sake of clarity, and, in several instances, in order to provide a proper basis for the proposed NSHC determination. My comments follow.

1. Description of the Amendments

In the portion of the proposed notice that purports to be a "description of the amendment request," only a very vague, generalized characterization of the amendments is given. Although more detailed descriptions of most the license changes are given in the portion of the proposed notice on "basis for proposed no significant hazards consideration determination," that is not where the public is directed to look for a description of the amendments and, in any event, even those descriptions, in some instances (items B, D and E) do not indicate what changes would actually be made to the license. To better describe the actual amendments in the proper place in the notice, I suggest that the "Description of amendment request" be revised to read:

Amendments to the license supporting operation after the current refueling outage and changes to the Technical Specifications (TS) to reflect plant modifications performed during the current refueling outage. Specifically, the amendments are

(1) changes to the license related to the Cycle 6 core reload involving removal of depleted fuel assemblies in about one-third of the nuclear reactor core and replacement with new fuel of the same type previously loaded in the core with attendant license changes in [core protection safety limits, protective system setpoints and rod position limits, etc.?] reflecting the reload;

(2) [currently "A"] changes to the TS to revise the tables listing surveillance instrumentation for suppression pool bulk temperature reflecting the installation of 16 sensors for an improved torus temperature monitoring system and a revision to the basis for the existing limits on torus water temperature;

- (3) [currently "B" - describe the actual license changes, not currently described anywhere in the proposed notice, for the scram discharge instrument volume];
- (4) [currently "C"] changes to TS surveillance instrumentation tables to add new instrumentation for containment high-range radiation monitors and to add new instrumentation, and delete current instrumentation for drywell pressure-wide range and suppression chamber wide-range water level in response to requirements in NUREG-0737;
- (5) [currently part of "C"] TS changes to incorporate calibration and surveillance requirements for time delay relays to prevent spurious isolation of the HPIC and RCIC systems as required by NUREG-0737;
- (6) [currently "F"] revision of the TS table for containment isolation valve surveillance to add two new isolation valves that are part of a newly installed redundant discharge line from the drywell compressor into containment;
- (7) [currently "G"] revision of the TS to reflect installation of strong backs on personnel airlock doors to allow testing in accordance with 10 CFR Part 50, App. J;
- (8) [currently "H"] revision of TS to provide limiting conditions for operation and surveillance requirements for electric power monitoring for the reactor protection system power supply;
- (9) [currently "D" - describe the actual license changes, not currently described anywhere in the proposed notice, for the analog trip system];
- (10) [currently "E" - describe the actual license changes, not currently described anywhere in the proposed notice, for the thermal power monitor];
- (11) [currently "I"] administrative changes to the TS involving changes to the Table of Contents to reflect the above license changes, an editorial change and corrections to the list of sample valves to be consistent with present plant configuration.

The descriptions of the license changes given in the "basis for proposed no significant hazards consideration determination" should be retained because they describe the changes in more detail and show that, for the most part, the changes are being made pursuant to NRC requests or "requirements."

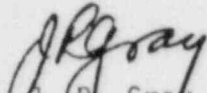
2. Basis for Proposed No Significant Hazards Consideration Determination

This portion of the notice should provide the basis for the proposal to find NSHC for each of the 11 categories of amendments described above. For (1)-the reload amendments-the current writeup on basis for NSHC appears adequate. Similarly, the basis for a NSHC finding on change (11) (purely administrative changes falling within Commission example (i) of actions likely not to involve SHC), as written on p. 9 of the proposed notice should be set forth.

For changes (2) through (8), you would propose to find NSHC on the grounds that these changes fall within example (vii) of actions not likely to involve significant hazards considerations-specifically, that these are changes "to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations." It is not at all clear to me that, in fact, any of the changes (2)-(8) fall within this example. First of all, the example involves changes to the license to make it conform to changes in the regulations. From the descriptions of proposed changes (2)-(8), not one of those changes involves an amendment to the license in order to make the license conform to a "change in the regulations." Nor is it apparent that any of the changes (2)-(8) "results in very minor changes to facility operations clearly in keeping with the regulations." In fact, I believe that example (vii) was meant to encompass minor license amendments made to eliminate inconsistencies between license requirements and new or amended regulations (e.g. a number of recent notices citing example (vii) have involved license amendments to change cert in surveillance intervals from annually to monthly after the regulations were changed to require monthly surveillance). Thus, the bases for the proposed NSHC determination for changes (2)-(8) should be modified either to clearly show that example (vii) applies or, if neither that nor any other example applies, to show that each of the license changes will not (a) significantly increase the probability or consequences of accidents previously evaluated, (b) create the possibility of a new or different accident from any previously evaluated or (c) significantly reduce a safety margin.

Finally, I have a real problem with the proposed basis for NSHC for changes (9) and (10). The basis given is that these modifications have been reviewed and approved for other BWRs and, therefore, NSHC are involved here. I am not aware that we have ever based a finding of NSHC on the fact that a license amendment similar or identical to the one in question was previously reviewed and approved for another plant. In fact, a petition for rulemaking that would have established as one basis for finding NSHC that a similar amendment had previously been approved for another facility was specifically rejected by the Commission. Thus, I believe you must provide other bases for a NSHC finding for changes (9) and (10). If changes (9) and (10) do not fit any of the Commission's examples of actions not likely to involve SHC, then some bases must be provided for finding that these changes will not significantly increase the probability or consequences of an accident, will not significantly decrease a safety margin, and will not create a new or different accident.

Because of the problems noted above, particularly those involving the basis for NSHC, I am not prepared to concur in the proposed notice at this time. Please give me a call if you have any questions.


J. R. Gray