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October 26, 1983

Note to: J. Scinto

From: R. Rawson

SUBJECT: BROWNS FERRY AMENDMENT PACKAGE RELATING TO INCREASE IN COOLANT FLOW DURING COASTDOWN

The Staff provides two reasons for its proposed no significant hazard consideration determination in relation to this amendment: (1) concurrence in the licensee's assessment of the 10 CFR 50.92 factors; and (2) Commission example (iii) (nuclear reactor core reloading). I cannot agree that the statement of basis for finding that the proposed amendment does not "involve a significant increase in the probability or consequences of an accident previously evaluated" is adequate. Some conclusion must be stated that the "slight" increase in MCPR operating limits is still within acceptable limits. As to the use of Commission example (iii), I do not believe that every license change that gets made during a refueling outage can be justified as posing no significant hazard consideration by virtue of the reload example. This amendment appears to be only coincidentally related to reload and appears not to be encompassed by Commission example (iii).

I recommend that this package be returned for revision without ELD concurrence.

R. R.

Richard J. Rawson

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