February 28, 1984

Note to: J. Scinto

From: R. Rawson

SUBJECT: BROWNS FERRY SHOLLY PACKAGE RELATING TO CORE PHYSICS, ETC.

One of the technical specification changes involved in this package
relates to the deletion of scram functions under particular conditions.
See No. 5 "Scram Permissive Pressure Switches at 1055 psig" at
pp. 16-17. This write-up seeks to bring this amendment within
Commission example (iv) ("results of the change are clearly within all
acceptable criteria . . . "). I do not consider the write-up adequate
for this purpose as presently written. It reads in pertinent part:

> Our preliminary evaluation of the proposed change also indicates
> that it is not likely to reduce a safety margin; however, the
> technical merits cannot be judged until the staff's safety
> evaluation is completed. Before the proposed change is approved,
> the results will clearly have to be within all acceptable criteria
> for these scram functions in the Standard Review Plan.

This rationale confuses the ultimate safety findings with the NSHCD
standards. If the Staff cannot find now that "the results of the change
are clearly within all acceptable criteria," then this basis cannot be
relied upon for a preliminary NSHCD finding.

I recommend that OELD not concur in the package in its present form.

                                                    R.R.

cc: J. Gray

I agree with Rich Rawson's comment noted above but I have
an additional problem. Item 12 in the attached package would incorporate changes
attendant to making the APRM respond to thermal flux rather than all neutron
flux. This is said to prevent certain types of scrams due to small fast flux
transients (p.23). While, on its face, the change would impose surveillance requirements
etc. not currently in the license, the real affect of item 12 is to approve a change
in a trip function that will reduce the number of trips - ie. to approve a change
in trip function that is less restrictive, from the standpoint of likely number of
reactor scrams, than is presently required. Because of this, I think it is misleading
to say that change 12 overall imposes more restrictive requirements and is encompassed
by example (ii) of the examples of actions not likely to involve SHC. I believe that
the staff needs to come up with some different basis for finding NSHC for change 12.

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