

February 28, 1984

Note to: J. Scinto

From: R. Rawson *RR*

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.

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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 - i.e. 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 NSHCD for change 12.

J. Gray