TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401 5N 157B Lookout Place

SEP 12 1988

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

Gentlemen:

In the Matter of Docket Nos. 50-259
Tennessee Valley Authority Docket Nos. 50-259
50-260

BROWNS FERRY NUCLEAR PLANT (BFN) - RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION - AUTOMATIC DEPRESSURIZATION SYSTEM (ADS) ACTUATION MODIFICATION (TAC NO. 45681)

This letter provides TVA's response to NRC request for additional information on the above subject dated August 10, 1988. Enclosed for your review is the engineering change notice package (including the safety evaluation), and applicable drawings for the ADS actuation modification. Please note that the timer is set per our Technical Specification # 248 (TAC 00090) submittal of July 29, 1988.

Piease refer any questions concerning this submittal to Patrick Carier at (205) 729-2689.

Very truly yours,

TENNESSEE VALLET AUTHORITY

R. Gridley, Manager Nuclear Licensing and Regulatory Affairs

Enclosures cc: See page 2

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Ms. S. C. Black, Assistant Director for Projects TVA Projects Division U.S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

Mr. F. R. McCoy, Assistant Director for Inspection Programs TVA Projects Division U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

Browns Ferry Resident Inspector Browns Ferry Nuclear Plant Route 12, Box 637 Athens, Alabama 35611

	t distribution and annual family	Number 2-P7116 RO RIMS Accession Number
	Rafarences (Authorizing Document) DCR# 3478	B22 '98 0617 5
		suriz ion System (ADS) Logic Changes- Sheet #2.
		UREG-0737 Item II.K.3.18-
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ENGINEERING ANGE NOTICE COVER CONTINUATION SHEET IVA-BENT

* E-2-P7116

REV#: 0

S# #: 2 OF 3

DESCRIPTION	N OF CHANGE:	
	E-2-P7116) modifies Automatic Depressurization System (ADS)	Logic by addition
of:		
	our Time Colay pick-up relays (Two for logic Bus A and two f	or Logic Bus B)
		Asset Vitro ye
	n control Panel 9-30 which bypass high drywell pressure sign	
s	ustained low reactor water level 1. (Refer Calc #ED-02001-88	257 for Bypass
T	imer Setting).	*
2. T	wo keylock control switches (one for Logic Bus A and the oth	er for Logic
В	us B) on control Panel 9-3 to allow operator to inhihit the	ADS initiating
1	ogic.	100000000000000000000000000000000000000
3. A	nnunciation on window #31. Annunciator XA-55-3C Control Pane	1 9-3 to indicate
	perator that ADS logic Bus A or Bis inhibited.	
T	his ECN replaces the existing timers 2E-K34 and 2E-K35 (120	ear carring)
	ith Class 1E timers (105 sec setting). (Refer Calc # ED-Q20	241 P
	* Property Research and the second of the se	
	ec. timer setting).	
· T	his ECN also reallocates the Annunciation "RCIC Relay logic	power failure"
	rom annunciation window #31 to window #1, annunciator XA-55-	3C, Control
P	anel 9-3.	
A CONTRACT		
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ENGINEERING CHANGE NOTICE

FORM_NO. F-201-8.1_2.1

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warer level and add manual in	hibit switch. (Refer	ence-Let	ter from J	A Domer (TVA)
to D R Muller (NRC) dated 3-5	-87, RIMS# L448703058	03).		1,60%
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2	# Index Sheets and Continuation Sheets						3	0
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2	# Screening Review		0				6	-0
	# DCA(s), Primary & Critical Dwss Only							7
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Denotes minimum ECN Package contents

OTHER: May include Functional and Post Mod Test Requirements/Acceptance Criteria. Tech Spec Change Request, Special Installation Instructions, Inspection Requirements/Acceptance Criteria, etc.

FORM 140 1-201-9.

ECY PALMOR INDEX SHEET SECTION B IVA-BENE

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- OTHER: May include Associated Drawings List, Specifications, Vendor Manuals, etc.

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^{*} Denotes calculations are part of the ECN Package but not physically included. OTHER: May include Procurement Documents, FSAR Change Requests, Setpoint Changes, Seismic/Elec System Analysis, Reliability Analysis, In-service Inspection, CAQR. etc.

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m. 1	- 12.00	makes two of	sanger to the	ADS init	iation 1	orict	(1) Replaces the existing	ng ADS timer
							of the 120 second ADS t FSAR Appendix N, section	

17. Description of Proposed Activity (Continued)

requirement that, with a high drywell pressure condition, the total maximum time delay for ADS initiation and MSRV movements be 120 seconds.

(2) It adds a new bypass timer which will provide for automatic initiation of ADS without the high drywell pressure after approx 855 seconds. This 855 second time delay is the combination of the revised 105 second ADS timer plus the new (bypass timer) 750 second timer. This change would provide for automatic initiation of ADS for certain scenarios while allowing the operator approximately 14 1/2 minutes to determine if ADS initiation is warranted and to take appropriate actions, including resetting the timer signal if necessary.

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Project

BFNP Unit 2

Safety Evaluation Number SEBFECN880009

18. System(s), Structure(s), or Component(s) Affected

Automatic Depressurization System (ADS) - System 1

19. Safety Function(s) of System(s) Affected

ADS provides for automatic nuclear system depressurization, if needed, for small breaks in the nuclear system so that the Low Pressure Coolant Injection (LPCI) and the Core Spray System (CSS) can operate to protect the fuel barrier from overheating which would result in the uncontrolled release of fission products from the reactor fuel barrier (Reference FSAR section 4.4.).

20. Effects on Safety

The first part of this ECN involves replacing the existing ADS timer relay with a Class 1E qualified timer and changing the associated setpoint from 120±5 seconds to 105±7seconds. This will provide assurance that the system time delays assumed in the BFN LOCA accident analysis are met. BFN FSAR Appendix N, section N.6.5.10 states that a time delay of 120 seconds is the maximum practical delay time for ADS initiation. Therefore, this portion of the ECN improves safety by assuring ADS initiation within the time required.

The second part of this ECN, the installation of a high drywell pressure bypass timer, provides a means of assuring adequate core cooling for certain transient and accident events (i.e., pipe break outside primary containment) degraded by the loss of high pressure injection systems. Basically, the delay setting for the bypass timer must allow for (1) avoidance of excess fuel cladding heacup, and (2) sufficient time to allow high pressure makeup systems to recover the RPV water level or to allow the operator sufficient time to prevent automatic depressurization from occuring during an ATWS event (see Reference 4).

The design basis event for the ADS high drywell pressure bypass timer is the main steam-line break outside containment (Ref 4). This event results in the greatest inventory loss prior to break isolation. Following break isolation, it is assumed that all high pressure makeup systems will be lost. The General Electric analysis (Ref 4) concluded that the upper analytical limit for the ADS bypass timer setting is 15 minutes and further concluded that the lower analytical limit for the ADS bypass timer setting is 10 minutes. These limits provide assurance that excessive fuel cladding heatup will be avoided while allowing sufficient time to allow high pressure makeup or operator action to prevent automatic depressurization from occuring during an ATWS event.

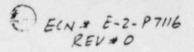
This ECN provides for the installation of a new bypass timer with a setpoint of 12 1/2 minutes. This is midway between the upper and lower analytical limits provided by General Electric.

To meet NUREG 0737, item II.K.3.18, the ADS modification also includes a manual inhibit switch to the ADS initiation circuit. This change to the physical plant will help prevent inadvertent ADS actuation due to operator error. The new manual inhibit is a key-lock switch, so two separate actions are required to install the inhibit. This decreases the possibility of inadvertent operator action to inhibit the ADS. It will have negligible impacts on ADS reliability since it is already possible for the operator to inhibit ADS. However, this feature has several advantages over the current mechanism for manually inhibiting ADS actuation. Presently, the 120 second (to be 105 seconds) must be reset before it times out (i.e., every two minutes, not just one time) in order to prevent ADS initiation. The new manual inhibit frees the operator for other duties since the timer circuit does not require resetting once the new inhibit is selected. The present method of resseting the ADS 120 second (to be 105 seconds) timer will still be available. Another means presently available for inhibiting ADS initiation is to pull the fuses of the ADS Control Circuitry; however this method of inhibiting ADS initiation is still available.

Based on Reference 7, ECN P7116 will not affect the operation of any of the MSRVs nor the core analysis performed for an Appendix R fire event.

The wiring and components for the circuit modification are similar to or better than those presently used so reliability of the new circuit is the same as the present circuit. Although this modification provides more paths for ADS initiation (i.e., high drywell pressure or bypass timer timed out) the probability of an unnecessary RPV depressurization is not significantly affected by the proposed modification because any slight increase in the probability of spurious actuation is approximately offset by a decrease in the probability of inadvertent manual depressurization as described in the preceding paragraph (BWKOG report, page 56, Reference 6).

In summary, this ECN increases the safety and reliability of the Core Standby Cooling System by climinating the need for operator action during an off-normal event curently requiring manual depressurization and decreasing the possibility for unneeded depressurizations caused by operator error. This modification satisfies the requirements of NUREG 0737. "Clarification of TMI Action Plan Requirements" item II.K.2.18.



SAFETY EVALUATION FORM

Sheet 4 of 6

Project

Safety Evaluation Number

BFNP Unit 2

21. Would the proposed activity increase the probability of an accident previously evaluated in the FSAR?

[] Yes [X] No

Justification:

The current modification of the ADS logic eliminates the need for operator action to depressurize the reactor for certain scenarios (i.e., pipe break outside containment) where depressurization is warranted. This modification allows sufficient time (approximately 14 1/2 minutes) for the operator to inhibit ADS initiation for those situations where ADS initiation is not desired (i.e., ATWS event). The probability of inadvertent manual initiation is higher for the current ADS logic because the operator, knowing that for some events he is responsible for manual depressurization, may be more apt to err in what he believes is the conservative direction by depressurizing the RPV to allow low pressure cooling (Reference 6)

Would the proposed activity increase the consequences of an accident previously evaluated in the FSAR?

[] Yes [X] No

Justification:

Although this modification of the ADS initiation logic provides the automatic initiation of the ADS for certain scenarios where a high drywell pressure condition does not exist, it does not change the function of the ADS. The consequences of inadvertent initiation of ADS are the same as previously evaluated.

23. Would the proposed activity increase the probability of a malfunction of equipment important to safety previously evaluated in the FSAR?

[] Yes [X] No

Justification:

Although this modification provides more paths for ADS initiation (i.e., high drywell pressure or bypass timer) the probability of inadvertent initiation of ADS is essentially the same as previously analyzed. This is because four high drywell pressure bypass timers are to be installed, one in each channel of the ADS initiation logic. Channels A and C comprise Trip System I, while channels B and D comprise Trip System II. Both channels of one division are required to energize to initate ADS. Considering that other signals must be present in each channel for ADS initiation (i.e., low water level, confirmatory low water level, lo5 second timer, availability of low pressure ECCS), the failure of any one bypass timer will not cause inadvertent initiation. Multiple failures in each channel of a division is necessary to provide inadvertent initiation. Based on the above the probability of a malfunction of equipment important to safety (ADS initiation logic) is essentially the same as previously analyzed.

same as previously analyzed.

24. Would the proposed activity increase the consequences of a malfucntion of equipment important to safety previously evaluated in the FSAR?

[] Yes [X] No

Justification:

Several coincident signals are required for ADS initiation (i.e., high drywell pressure or bypass timer, low water level, confirmatory low water level, 105 second timer, ECCS availability) as well as the energization of both channels in a Trip System. The failure of any component in a logic channel will not result in inadvertent initiation of ADS. Also, the failure of any component (relay to close) will not result in the loss of ADS as the other Trip System is still available. Therefore, the consequences of the failure or malfunction of equipment important to safety is not increased.

SAFETY EVALUATION FORM

Project

Safety Evaluation Number

BFNP Unit 2

25. Would the proposed activity create a possibility for an accident of a different type than any evaluated previously in the FSAR?

[] Yes [X] No

Justification:

Modification of the ADS initiation logic does not create the possibility of an accident of a different type. The possibility of inadvertent ADS initiation existed before and will still exist after this modification. This modification provides automatic initiation of ADS where warranted while allowing sufficient time for the operator to inhibit ADS initiation when it is not desired. This change also provides a keylock switch to free the operator from having to continuously inhibit ADS initiation (i.e., every two minutes) as was previously required for situations where ADS initiation is not desired.

26. Would the proposed activity create a possibility for at malfunction of equipment of a different type than any evaluated previously in the FSAR?

[] Yes [X] No

Justification:

The possibility of the failure of the ADS initiation logic exisited before and still exist after this modification. Several coincident signals are required for ADS initiation, the failure of any one relay will not result in ADS initiation.

27. Would the proposed activity reduce any margin of safety as defined in the basis for any technical specification?

[] Yes [X] No

Justification:

Addition of a drywell high pressure bypass timer increases the reliability of the system for certain, narios (i.e., pipe break outside containment) while providing sufficient time for ope or action for situations where ADS initiation is not warranted. The addition of a keylo, switch to inhibit ADS initiation assist the operator for these situations. Based on the a reve the margin of safety as defined in any tech spec is not reduced. (See Reference 2)

Sheet 6 of 6

SAFETY EVALUATION FORM

Proje	ect	BFNP Unit 2	Safety Evaluation Number SEBFECN880009
Ct	neck	below (x) the subject for this page.	
28a.		Special Requirement(s) or Precaution(s)	
286.	- X	Safety Evaluation	A CONTRACTOR OF THE PROPERTY O
28c.	х	Additional Information	

29.

SAFETY EVALUATION

Based upon the discussion provided under "Effects on Safety" and the response to the questions in Blocks 21 through 27 the changes contained in this ECN do not constitute an unreviewed safety question.

ADDITIONAL INFORMATION

This ECN involves a change to the Technical Specifications, this Tech Spec change and associated justification are being handled seperate from this USQD.

ECN/DCN0: _ E-2-P7116 ECH IMPACT AND PREREQUISITES LIST REVØ: ____O__ SH #: ___1__OF IVA-BENP DISCIPLINE: ___ALL THIS ECNIDON IMPACTS No existing: ECNs, DCNs, DDs, LDCRe, TAGFs or FCRs THIS ECY/DON No existing: ECNs, DCNs, DDs, LDCRs, CAORs, TACEs or FCRs IS IMPACTED BY ECNs/DCNs WHICH ARE PREREQUISITES TO THIS ECN/DON No existing ECNs, DCNs, DDs, LDCRs, CAORS, TACTS or FCRe are pre-requisites to this ECN.

PREPARED BY: Day & Some DATE: 6-2-88 CHECKED BY: Soul StanpalL

DATE: 6-13-88

FORM NO. E-201-8.3.1

ECN ASSOCIATED DRAWINGS LIST TVA-BENP

ECH#: E-2-P7116 REVO: 0 SE 0: ____ OF 1 ___

DISCIPLINE:	ALL	

DRAWINGS NUMBER	REVISION	IS DRAWING ATTACHED TO PACKAGE Y OR N
45N2641-5	24	N
45N2641-6	27 :-	N
45N2668	7 =	×
DS-E12.1.5		N
SD-E12.5.1-1	0	N
SD-E12.5.1-2		и
SD-E12.5.1-3		N N
SD-E15.3.2 '	4	N
458711	,	N
47W611-0-1		N
47W225-3		N
47W225-9	A	z N
488800-1	7	И
48B800-2	8	N
45W670-7	4	И
2-45W670-19	000	N
2-4340/0-12		

FORM NO. E-201-8.4.1 |

PREPARED BY: David Sum CHECKED BY: SpellAncepall

DATE 6-2-88

DATE 6-13-88

QA Record

HODIFICATION CRITERIA DOCUMENT COVER SHEET TYA-BEND

ECN#:	E-2-P7116
REV# :	0
SI #:	1 OF _8

	DISCIPLINE:	ALL				141.14		
JNIT:		SYSTE	M NUMBE	R:	1			
CN TITLE: Automati	ic Depressurizat	ion System	(ADS) I	ngic Ch	anges			
BSTRACT:								
At present, the au	utomatic depress	surization	system	(ADS) ca	n only	he init	faced .	_
in the presence of								_
	rvwell Fressure							-
(2) Low Re	actor Water Leve	el (Level 1)					
	matory Low Reac							
	essure Coolant							
m. t. wast would are	at a spe land a be	u himanaina	high d	95-5-75-7-53-1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	B T G S SIII	18 13 88 1:313 1. 1	SSIVE OF	n
12.5 minute susta	ined low reacto	r water lev	el (lev	el 1) a	nd add1	ng inhi	bit con	rol
12.5 minute susta switch to manual1 This ECN replaces	ined low reacto	r water lev	el (lev	el 1) a	nd add1	ng inhi	bit con	rol
12.5 minute susta switch to manual1 This ECN replaces	ined low reacto	r water lev	sec set	el 1) a	rith 1E	qualifi	ed time	ers
12.5 minute susta switch to manual1 This ECN replaces	ined low reactory inhibit ADS-1 the existing to	r water lev	el (lev	el 1) a	nd add1	ng inhi	bit con	ers
12.5 minute susta switch to manual1 This ECN replaces	ined low reacto	r water lev	sec set	el 1) a	rith 1E	qualifi	ed time	ers
	ined low reactory inhibit ADS-1 the existing to	simers (120	sec set	el 1) a	rith 1E	qualifi	ed time	rol

MODIFICATION CRITERIA DOCUMENT DESIGN BASIS/BASES TVA-BENE

ECN/DCH0: E-2-P7116

REV0: 0
SE 0: 2 OF 3

1.0	SCOPE	
	1.1	System(s) Main Steam System
	1.2	Feature(s) Addition of Time Delay Pick-up relays and control switches
	1.3	Scope of Criteria This modification revises the control circuit of Automatic Depressurization System (ADS)
	1.4	Is Quality Assurance Required? ves
	1.5	List existing design criteria document(s) with revision number that cover this modification <u>BFN-50-727 RO. BFN-50-728 RO. BFN-50-736 RO</u> BFN-50-C-7105 R1
2.0	(Pro	wide the following information if it applies to this modification If the required information can be found in existing design It documents, give the document number and revision number only.
		Functional Requirements This modification enables to bypass high drywel pressure permissive in ADS logic on 12.5 minutes sustained low reactor
	2.2	Design Basis Events As referred in design criteria 3FN-50-7001 Rl
		and General Electric Analysis for ADS bypass analysical limits (DRF-A00-03088)
	2.3	Environmental Requirements N/A

HODIFICATION CRITERIA DOCUMENT DESIGN BASIS/BASES IVA-BENE

ECN	1	D	CH#:		E-2-P	7	1	1	6	•
REV	*	:			0					
SII	\$:	. 3	-	OF_		8			

2 /	IGN BASIS/BASES: (Continuation)
2.4	Instrumentation Requirements N/A
2.5	
	powered from 250VDC. Electrical system load or diesel generator loa
	not affected.
2.6	Mechanical RequirementsN/A
	The state of the s
2.7	Civil Requirements This modification provides seismic analysis
	of component mounting.
2.8	Regulatory Requirements NUREG-0737 Item II.K.3.18
	This modification reviews the existing AD
2.9	
	logic
2.1	logic
2.1	O Special Maintenauce N/A
2.1	logic O Special Maintenance N/A I Installation Requirements As specified by this ECN
2.1	O Special Maintenauce N/A
2.1	logic O Special Maintenance N/A I Installation Requirements As specified by this ECN
2.1	logic O Special Maintenance N/A I Installation Requirements As specified by this ECN

FORM NO. E-201-8.13.3 |

MODIFICATION CRITERIA DOCUMENT DESIGN BASIS/BASES TVA-BENT

ECN/DCH#: E-2-P7116

REV#: 0
SH #: 4 OF 8

TEST	AND INSPECTION REQUIREMENTS:
HOTE	: If the required information can be found in existing TVA documents, give the document number and revisions only.
3.1	Component Testing This modification initiates a post modification tes
	scoping document PMT #188
3.2	System Testing This modification initiates a post modification test s
	document PMT #188
3.3	Inservice Inspection N/A
OPER	ABILITY, RELIABILITY, MAINTAINABILITY, PERFORMANCE ANALYSIS:
**	
Unre	viewed safety question determination for this ECN covers the analysis.
Unic	viewed safety question determination for this ECN covers the analysis.
Unre	
Unre	
Unre	
-	
CONS	
COCK	ENTS:
COCK	ENTS: keys of the Key-lock control switches added by this modification should nder proper administrative control.
COCK	ENTS: keys of the Key-lock control switches added by this modification should
COCK	ENTS: keys of the Key-lock control switches added by this modification should nder proper administrative control.
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MODIFICATION CRITERIA DOCUMENT DESIGN DOCUMENTS CHECKLIST IVA-BENE

ECN/DCN#: E-2-P7116

REV#: 0
SH #: 5 _ OF_8 - _

	IVA-DIDE				
		AFFECTED I/N/NA	Reference Document (if applicable)		
	Safety Analysis Report affected? If yes Figure # Sect. #	Y	FSAR SECTIONS 6.4.2, 6.5.3.1, 7.4.3.3.2 & 7.4.3.3.4 TABLE 7.4-2		
6.2	Tech. Spec. Change? Section No. Is this equipment covered by, or will change affect Tech. Specs.?	Y	TABLE 3.2.B PAGES 3.2/4.2-14-15 and 17		
6.3	Seismic analysis required? Does this change have to be seismically qualified?	Y	CALC#CD~Q2030-882553 and #CD-Q2030-882554		
6.4	Are electrical calculations affected?	N			
6.5	Human factor review required? Control Room modifications only.	Y	HED REPORT #200 and #150		
6.6	Impacts other analyses or calculations? Will this ECN require a revision to existing enalyses or calculations?	- Y	CALC#ED-Q2001-88262 Supercedes Calc # BFEP-E1-86003		
6.7	Revision to Environmental Impact Statement required? Does this ECN affect any existing commitments?	N			
6.8	OSBA considerations? Should you have guards on rotating equipment and/or does a procedure require revising?	N			

DESIGN DOCUMENTS CHECKLIST

ECN/DCN#: E-2-P7116

REV#: 0
SB #: 6_ 0F 8

	*	IVA-BENI		SB #: _ 6 OF 8 _
			I/N/NA	(if applicable)
5.0	DES1G	N DOCUMENTS CHECKLIST: (Continuation)		
	6.9	Revision to state and/or Federal licenses or permits? Does this ECN impact		
	196	existing plant licenses or permits?	N	
	6.10	Environmental analysis affected (including data drawings).	N	
	6.11	Essentially mild environment calculations, EQ binders, and /or 10CFR50.49 list affected?	N	
	6.12	EQ category and operating times affected (MCEL)?	•	
			N	
	6.13	Vendors involved? If yes, reference Manuals or drawings.	Y	AGASTAT Catalog EMD-1 and Amerace Corp DOC #E7012/ E7022
	6.14	New or existing bills of materials		45BM2641 and 45BM2668
		affected?	Y	
	6.15	Construction specifications affected? -	N	
	6.16	Setpoint affected?		CALC#EDQ2001-88257 :
	0.10	Sechomic arrected:	Y	and #ED02001-88262
	6.17	Revision to design input documents required?	Y	BFN-50-7001 R1
	6.18	Non-IE load isolators affected?	N	7-
	6.19	Electrical penetration protective devices affected?		
		dearcas griecead:	N	
	6.20	Fuse Identification Program affected?	N	

DESIGN DOCUMENTS CHECKLIST

ECN/DCN#: E-2-P7116

REV#: 0
SH #: 7 OF 8

TYA-BENE Reference Document AFFECTED (if applicable) I/H/NA 6.0 DESIGN DOCUMENTS CHECKLIST: (Continuation) 6.21 Other protective devices affected? N 6.22 Instrument tabulations affected? 47B601-001 Y 6.23 Protective Relay Setting Sheets to be revised? N 6.24 Pipe stress analysis/evaluation require!? Does this ECN have an impact on the N piping stress analysis? 6.25 Does this ECN have an impact on piping vibration and/or testing requirements? N 6.26 Pipe rupture analysis required? Does rerouting of conduit, piping, etc. require a review for effects of a pipe N break, pipe whip, etc. Component/Equipment seismic qualification . required? Does this change increase the equipment nozzle allowables or components By Vendor qualifications 6.28 Does the ECN involve requirements for cleanliness as specified in ANSI standards? N 6.29 Are protective coatings inside containment affected? N 6.30 Flooding evaluation required? Will this modification increase the possibility of flooding? Does item require flood protection?

FORM NO. E-201-8.13.7

MODIFICATION CRITERIA DOCUMENT DESIGN DOCUMENTS CHECKLIST TYA-BENE

ECN/DCN#: E-2-P7116 REV#: 0 ST 1: . 8 _ OF _ 8

	AFFECTED Y/N/NA	Reference Document (if applicable)
6.0 DESIGN DOCUMENTS CHECKLIST: (Continuation) 6.31 Radiation shielding and/or ALARA considered? Is this a potential or located near a potential radiation source?	¥.	
6.32 10CFR50 Appendix 'R' required? If yes, Refer to Att. 9.12	Y	
6.33 Post modification scoping document required? If yes, refer to NEP 10.4	Y	This modification initiates PMT#188
6.34 Electrical or physical separation analysis affected?	N	
6.35 Security System modified?	N	
6.36 Heavy Loads considered?	NA	

10L. K50 APPENDIX 'R' CHECKLIST/EVALUATION SHEET IVA-BENE

ECN#: E-2-P7116 REV#: 0 SE #: 1 OF 4

ALL PISCIPLINE: Remarks ** No Yes QUESTIONS NO Does the change involve equipment on the 1. following Appendix 'R' documents?: BFN-BFS6-007 21 Sh6 a) Mechanical Equipment (Calculation 45B901 R1 Sh 8, 9, BFN-BFS6-007) b) Electrical Sapport Equipment (Drawing 45B901) and 10 X Does the change involve a cable on the Appendix 2. 'R' Cab'e List (Drawing 45B900)? X Does the change involve any of the following 3. fire protection systems, (Mechanical or Electrical)?: HPFP/AFFF(26), CO2 (39) X Does the change involve a penetration, 4. degradation, removal or modification of any of the following fire rated barriers?: (Exclude supports/hanger modifications) a) Walls, floors, ceilings, including Reactor SUS X Building floors 593, 621.25 and 639 SUL (47W21 Series). X b) Dampers (47W216-51, Table 4). 316 X c) Doors (47W216-51, Table 3). d) Conduit/Cable fire wrap (45W807 Series). Does the change affect emergency lighting units 5. or shutdown access paths as shown on emergency lighting Ingress/Egress routes and major shutdown

equipment drawings (45W400-RW)?

ECN#: E-2-P7116

REV#: 0
SH #: 2 OF 4

No.	Ouestions	Zes	No	Remarks **
5.1	Does the change add or delete any electrical distribution or control equipment (board panels, inverters, etc.) into or out of shutdown board rooms (* fire areas 4 thru 15 and 22 thru 24) or Battery and Battery Board room (fire areas 17, 18, & 19)?		x	
6.2	Does the change add or delete any cable into or out of shutdown board room and battery board room fire areas (4 thru 15, 22, thru 24, 17 thru 19) except cables designated as C, CR, FE, K LS, CT, SP, T, A & R?		x	
7.1	Does the change affect the pressure boundary of any component within the indicated Appendix 'R' system boundary drawings (47W230 Series).		x	uis
7.2	Does the change affect the electrical logic of any component within the indicated Appendix 'R' system boundary drawings (47W230 Series).	x		47W230-2 RO
8.1	Does the change and or move equipment containing combustible material (e.g. oil, grease, charcoal, electrical panels, etc.) in any of the fire areas as defined on compartmentation Drawings? (see Tables 1 and 2 on (47W216-51). (Exclude cables routed entirely in conduits or in trays without exceeding the fill capacity. Also exclude equipment with loss than 0.5 gallons of oil, 4 pounds of plastic, 4 pounds of grease or an equivalent amount of other combustible material).		x	الايا دالايا

CHECKI YEVALUATION SHEET IVA-SENE

REV#: 0 SE #: 3 OF 4

Nc.	Questions	Yes	95	Remarks
1.2	Does the change add cable trays in any of the fire areas listed in drawing series 47W216 Table-17	18.	х	
9	Does the change involve security access system in Reactor Building, Control Building, Diesel Generator Building, or Intake Pump Station? (Question to be deleted when security access control system design criteria is issued).		x	SUS

EVALUATION

A "Yes" answer to any qualition on the check list will be evaluated for Appendix 'R' impact, by the disciplines designated as follows:

Electrical - Questions # 1.b, 2, 3, 4, 5, 6.1, 6.2, 7.2, and 8.2

Mechanical - Questions # 1.a, 3, 4, 7.1, 8.1, and 9

Nuclear - Questions # 1.a, 6.1 and 6.2

During the evaluation, consideration was be given to any changes to the fire protection section of the FSAR. If necessary, use additional sheets for Approxime R evaluation.

- * .11 fire areas/zones are defined in Drawings 47W216-51 through -62.
- ** Additional information/justification should be included in this column when necessary. Additional sheets can be used if required. Questions which cannot be answered should be marked 'Later', but shall be resolved before plant modification is authorized.

Electrical/Mechanical/Nuclear Evaluation:

Automatic Depressurization S-stem (ADS) affects Six Main Steam Relief Valvas

of tag nos. 2-PCV-1-5, 2-PCV-1-19, 2-PCV-1-22, 2-PCV-1-30, 2-PCV-1-31 and

2-PCV-1-34 to relieve the high pressure steam to the suppression pool.

To meet NUREG 0737 Item II.k.3.18, this ECN revises the ADS logic b passing.

high drywell pressure on 12.5 minute sustained low reactor water level (level 1)

and addin veylock control switches to allow operator to inhibit the ADS initiating logic.

The existing timers (120 sec setting) with 1E qualified timers (120 sec setting) with 1E qualified

timers (120 sec setting) with 1E qualified

The wiring and components for the circuit panels 9-3 cm. 9-30.

Control Fan Jare located in the Fire Area 16. This ECN exther adds

les no modif the existing cables.

FORM 10. E-201-8.12.3

CHECKL 'EVALUATION SEEET

-	EV	:	0		
			4	_ OF _	4
1			-	7	

Per calculation BFN-BFS6-013 Rev. 1, the operation of the UNIT 2 MSRVs for Safe Shutdown would require the manual operation from the Main Control Room, at the Backup Control Panel (2-25-32), and at 250V RMOV Bd 28. This ECN does not affect the manual Control of any of the MSRVs from either of these locations.

Although the BFN Appendix R submittal does not rely on the automatic depressurization feature of the MSRVs, a complete blowdown via ADS significantly earlier than 20 minutes upon an Appendix R. fire event (time at which manual blowdown and manual injection of RHR System occurs) could cause too much RPV inventory loss and possibly exceed the BFN Appendix R fuel peak cladding temperature (PCT) limit of 15000 F (refer NEDC 31119 dated January 1986, Section 3.0). A review of the RPV water level response curves for the worst case Appendix R fire events (See Section 6.1 of NEDC 31119) indicates that a level 1 condition would not be reached any earlier than approximately 10 minutes. The new high drywell pressure bypass timer is set at 124 minutes and the existing (in series) timer will be set at 105 seconds (1 3/4 minutes). Thus, over 20 minutes would be required before an automatic blowdown occurred provided all circuits were operating properly. If a spurious level 1 signal initiated the new high dryvell pressure bypass timer, then 1) assuming all circuits worked automatically, ADS would blowdown and RHR would inject adequate water into the RPV or 2) assuming no circuits worked automatically then ADS would not actually initate since additional interlocks (low water level permissive, RHR/ Core Spray pumps running) would not allow the circuit to be made up. The above discussion of spurious operation criteria is contained in calculation BFN-BFS6-013 RJ as well as NFDC 31119. Based on the above, ECN E-2-P7116 will not affect the operation of any of the MSRVs or the core analyses performed for an Appendix R fire event.

6/14/2 10/14/88

1 2 7

Prepared By: James & Delie III Date: 3/13/88
Checked By: Sopols Arauapall. Date: 6/13/88

FORM NO. E-201-8.12.3

LOCERSO. 49 ENVIRONMENTAL QUALIFICATION — CHECKLIST/EVALUATION SHEET TVA-BENE

ECN4: E-2-P7116

REV4: 0

SB 4: 1 OF 2 ...

*2

RIMS # ALL DISCIPLINE(S): No Yes (x) . Could the change affect, aid, or delete equipment within the scope of 10CFRSO.49 (10CFRSO.49 List)? [X] 2. Could the change affect the basic function of a device or system that performs or supports the performance of a safety function (such as accuracy or setpoint; or interaction between a 1E and nonlE circuit)? [x] [] 3. Could the change affect design conditions or requirements such as process pressure, process temperature, fluid chemistry, device beating, boltage, and operating cycles which could impact QMDS requirements or invalidate test data? fx 1 [] 4. Could the change affect environmental conditions in either harsh or mild areas such as pressure, temperature, humidity, flooding, corrosiveness, site elevation, nuclear radiation (both rate and total integrated dose), and duration of exposure? [] 6 1 5. Could the change affect location or operation of high energy piping systems, location or operation of radioactive piping systems, operation of environmental controls systems, or environmental barriers such as walls, doors, relief panels, ducts, etc. (which could affect environmental conditions in either barsh or mild & eas)? [1] [] 6. Could the change involve elocating or reorienting a device or system which could impactlocation-specific or shielding analyses or place the device or system in an area with different environmental conditions?

10CFR50.49 ENVIRONMENTAL QUALIFICATION CHECKLIST/EVALUATION SEEET	ECM: E-2-P7116 REVI: 0 SB I: 2 OF 2	
TVA-BENE		
	Yes	No
. Could the change affect materials such as lu'ricants, seals, etc., which could impact QMDS requirements, qualification analyses, and invalidate test data?	[]	(x)
Does the change involve non-1E or 1E non-50.49 devices/circuits which have credible interaction failure modes with 50.49 devices/circuits?	[]	tx 1
DATE WOOD		
EVALUE STON		
Remarks (Provide justification for each item marked "Yes"):		
2. This change will not change the basic function of the A		
although it does change the time setting of two existing	g time del	av relays
(one for each Logic) and adds four time delay relays (t	to per Log	ic; one per
channel). The additional rime delay relays allow for t	he initiat	ion of the
ADS without the high drywell pressure signal. The time	setting c	hange to
the two existing relays (Tag #s 2E-K34 and 2E-K35) is t	o insure t	hat the
relays can function within the system upper analytical 1	imit 120 s	ec. and lower
analytical limit 90 sec. considering all the inaccuract	es.	
All the modifications of this ECN are in the mild envi	ronment and	do not affec
10CFR50.49 list.		
	-	
* *		
		1/17/00
Proposed By: _ former & Delke II	Date	115/00
Checker by: Delch House	Date	6/15/35

FORM NO. E-201-8.11.2_

DISCIPLINE FI & C BROWNS FERRY NUCLEAR _ANT ECN E-2-P7116 DCN NA * . *c +* -- DRAVING CHANGE AUTHORIZATION REVISION REVISION 5/4/63 COL. FRACT GWAN 11TY METERS NICH HI AC BUTTION ITEM ELABORE -NO NO NO 14 5/C Type SIS, 600V 41 Strand, 90°, cross-linked 200 FT WJC-6 1E C polyethylene. EA Time Delay Pick-up Relay Agastat E7012 SH, 3 to 30 PS BFP -IE min. 250V DC. DPUT. 8083112 EA Time Delay Pick-up Relay Agastat E7012SE, 20 to 200 PS BFP -1E Sec. 250V DC. DPDT. 8083R2 FT RKB 3'-31/2" Unistrut Channel P-4000 Size, 1 5/8" x 10 C NC 13/16" x16 Gauge cold enameled. Machine screw Hex slotted, 1/4" x 3/4" EA C NC Hex Head Galvanized, Unistrut HSHS025075 C. EA Unistrut, 1/4" 20 UNF Spring Nut P-4006-1420. C NC EA Unistrut #8-32 UNF Spring Nut F-4006-0832. 24 C NC EA Unistrut, #8-32 UNF Standard Screw, HRT S008087 CP. C NC Flat Plate Fitting, Bolt size 5/16", 11/32" Hole Size, E. RKO 24 BPP8-Unistrut P-1062. 194 Ri RKX-1 EΛ Splice Place, 2 holes, Galvanized, Unistrut P-1065 BFP8-194 R1 Cable 2/C, twisted, stranded, No. 18 Awx. polyethlene insulation, color coded, shielded, and 90° c, minimum UN'A-1 25 FT C 1E-LOCA black light stabilized chlorosulforated, type MS. 0 David. ECN-E-Z-PTILG RO ADDED NEW SHEET OF Koman Kokolsky B/W FOR !UX INTE RM (U 2) PNL 9-30 6-9-88 6/10/88 CHECKED DRAFTED REV. BY X SAFETY RELATED THIS CHANGE IS NOT RELATED TO NUCLEAR SAFETY

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DWG DWG

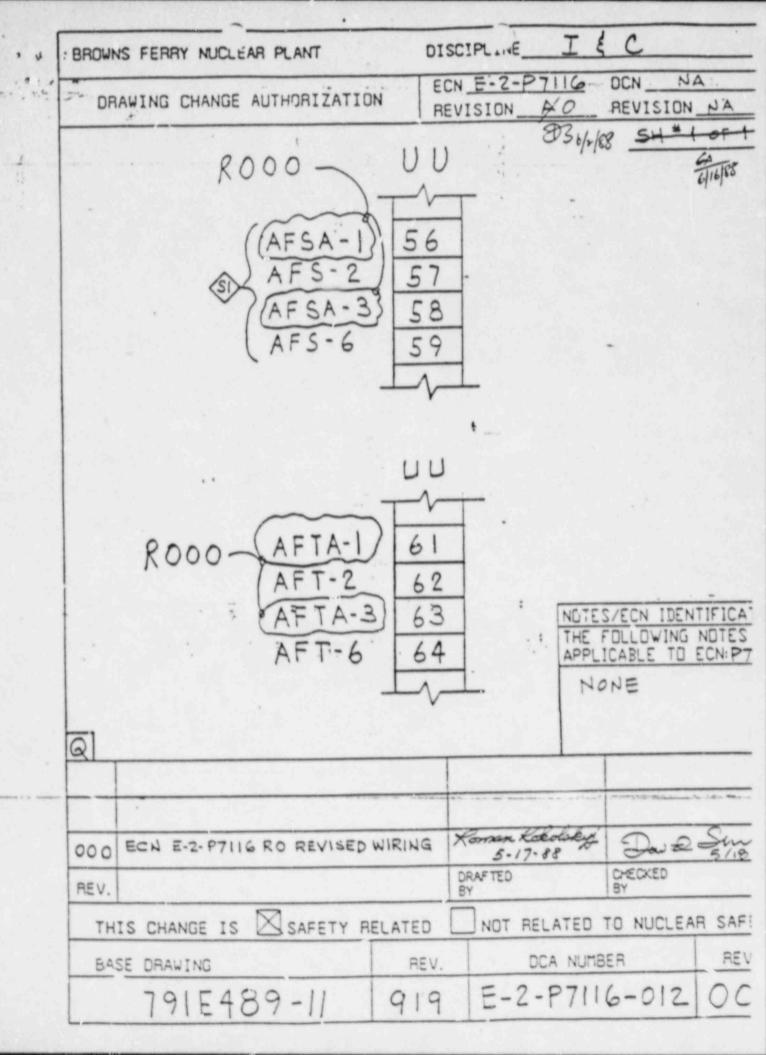
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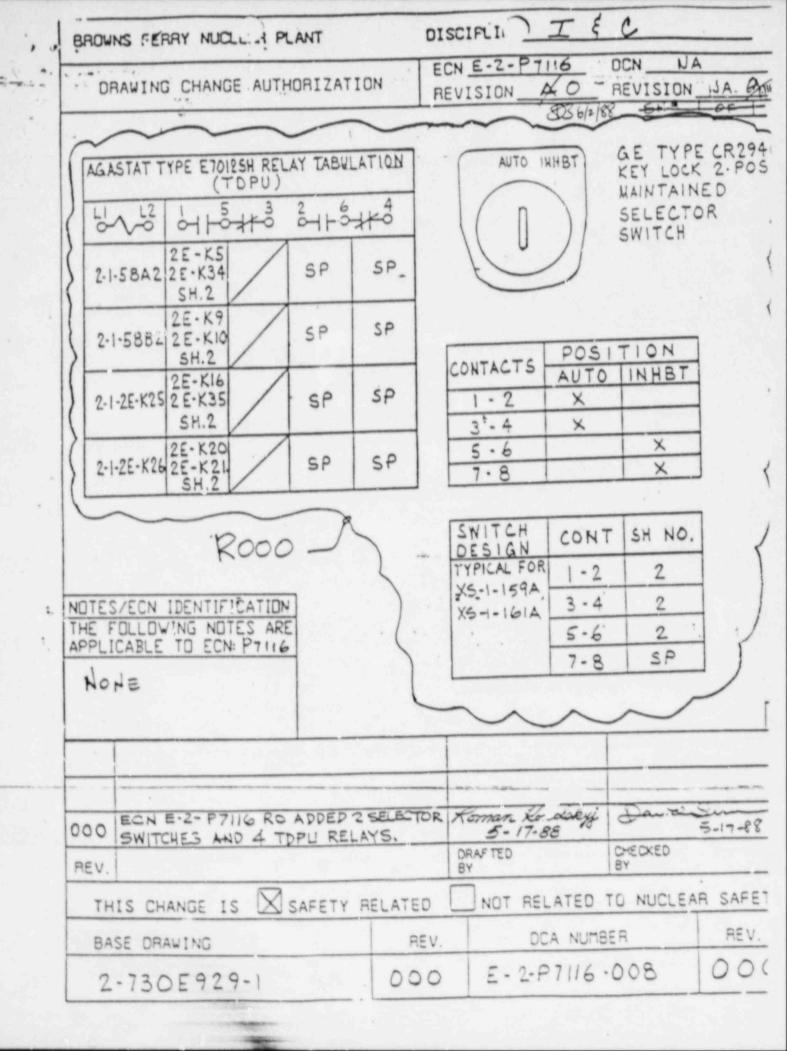
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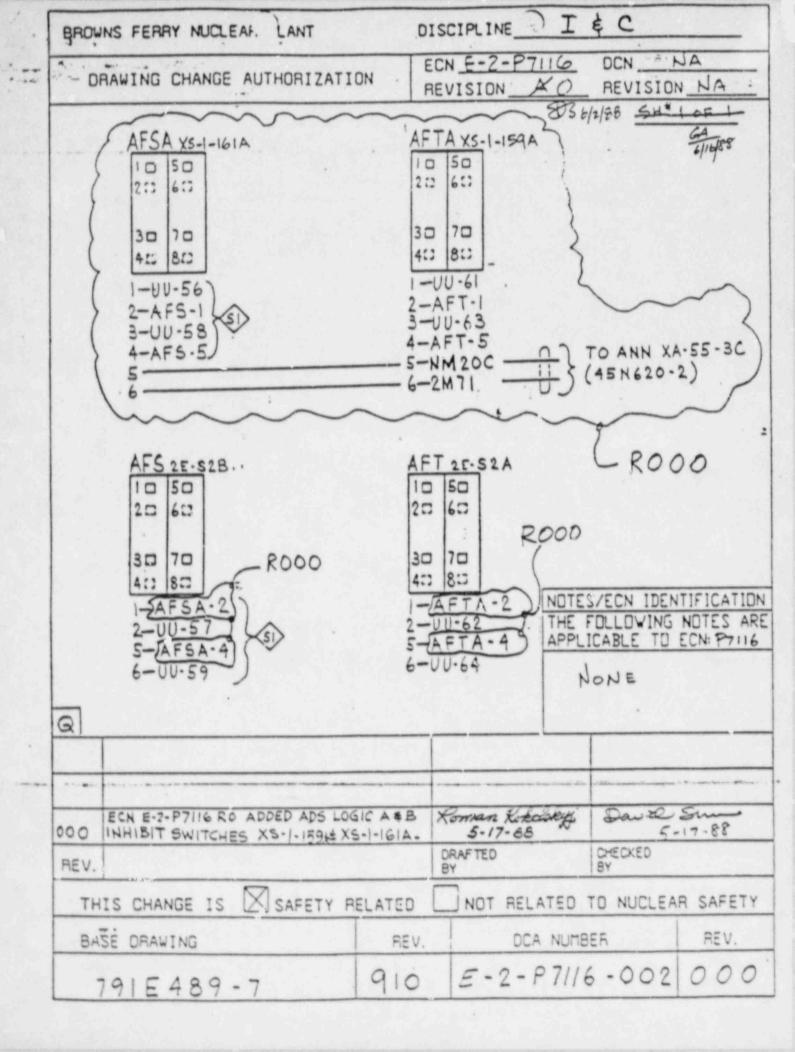
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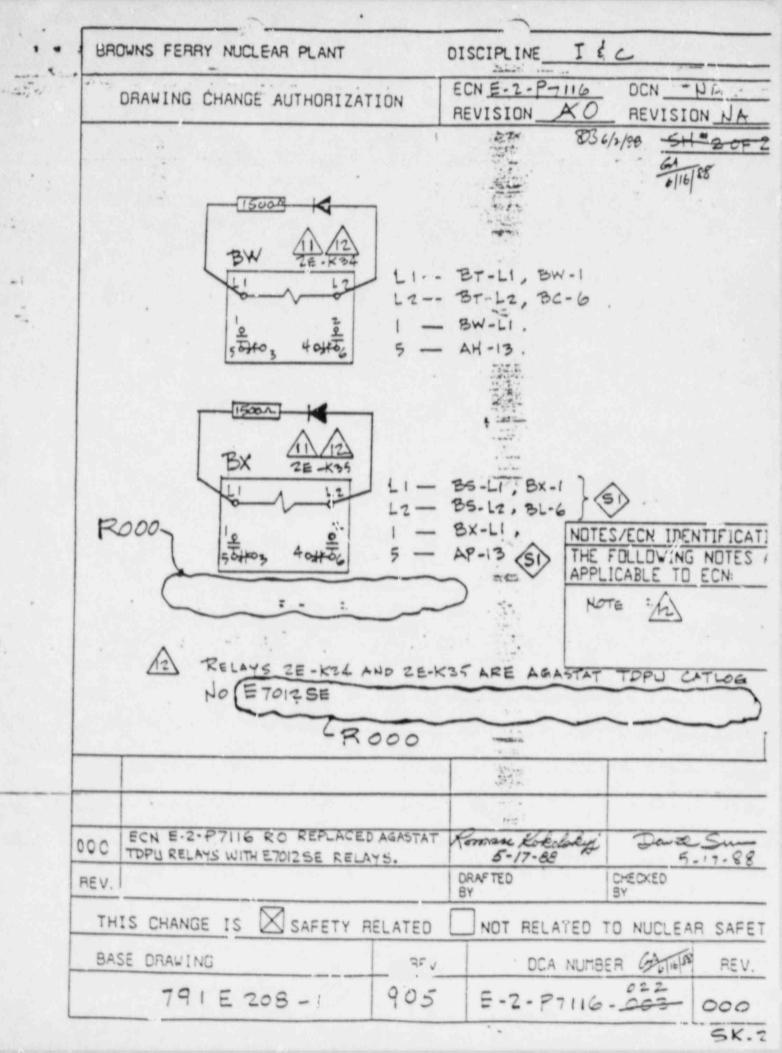
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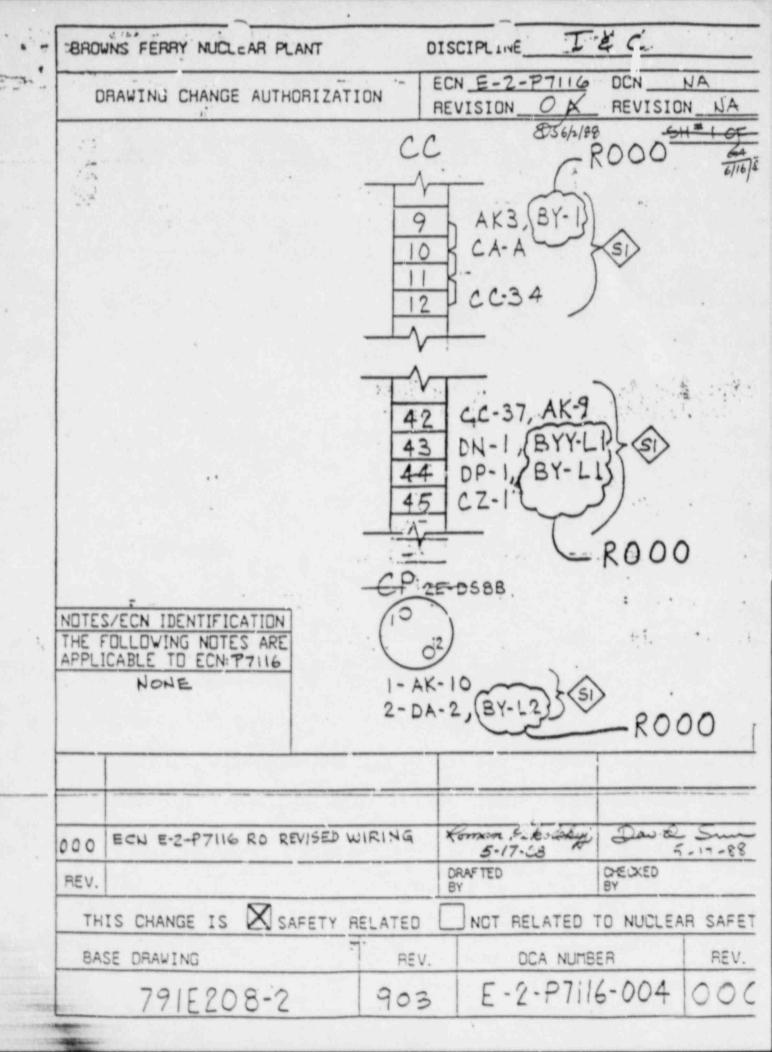
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