Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609

April 28, 1998

10 CFR 50.90

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

Gentlemen:

In the Matter of	)	Docket Nos. 50-259
Tennessee Valley Authority	)	50-260
		50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 TECHNICAL SPECIFICATIONS (TS) CHANGE - 362 - IMPROVED TECHNICAL SPECIFICATIONS (ITS) SUPPLEMENT 17 - ITS SECTIONS 3.1, 3.2, 3.4, 3.5, 3.7, 3.10, 5.0 AND APPLICABILITY OF STANDARD TECHNICAL SPECIFICATIONS (STS) BASES RELATED TO PERFORMANCE OF SURVEILLANCE REQUIREMENTS (SRs) DURING OUTAGES

This letter provides supplemental information in support of the TS-362 amendment request relating to the subject ITS sections. TS-362 is TVA's conversion package from Current Technical Specifications (CTS) to ITS and was originally submitted to NRC on September 6, 1996.

This package provides several changes to Justifications for Changes (DOCs) to CTS associated with comments provided by the NRC ITS Section 3.1 and Section 3.2 reviewer in a meeting on March 26, 1998. Several TVA generated DOC and mark-up updates are also provided, as well as two minor changes to the ITS Bases for Sections 3.1 and 3.5. A separate Enclosure is provided for each affected ITS Section with the revised Bases, DOCs, and mark-ups as applicable.

The enclosed supplemental information does not alter the determination that there are no significant hazards considerations associated with the proposed changes and the determination that the changes qualify for a categorical

exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosures to the Alabama State Department of Public Health.

This letter also serves to document BFN's position related to of the application of STS Bases provisions regarding the performance of a number of 18-month frequency SRs. Specifically, for approximately thirty-five 18-month SRs in STS, the STS Bases provides a text discussion similar to the two examples from Section 3.6, Containment Systems, which are repeated below for illustration.

" SR 3.6.1.3.9

Automatic PCIVs close on a primary containment isolation signal to prevent leakage of radioactive material from primary containment following a DBA. This SR ensures that each automatic PCIV will actuate to its isolation position on a primary containment isolation signal. The LOGIC SYSTEM FUNCTIONAL TEST in SR 3.3.6.3.7 overlaps this SR to provide complete testing of the safety function. The [18] month Frequency was developed considering it is prudent that this Surveillance be performed only during a unit outage since isolation of penetrations would eliminate cooling water flow and disrupt the normal operation of many critical components. Operating experience has shown that these components usually pass this Surveillance when performed at the [18] month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint."

" SR 3.6.1.3.10

This SR requires a demonstration that each reactor instrumentation line excess flow check valve (EFCV) is OPERABLE by verifying that the valve [reduces flow to 1 [illegible] on a simulated instrument line break]. This SR provides assurance that the instrumentation line EFCVs will perf[illegible] so that predicted radiological consequences will not be exceeded during the postulated instrument line break ev[illegible] evaluated in Reference 6. The [18] month Frequency is [illegible] on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillanc[illegible] were performed with the reactor at power. Operating

experience has shown that these components usually pass this Surveillance when performed at the [18] month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint."

In the BFN ITS conversion package, TS-362, in almost all cases, the typical STS Bases for the 18-month SRs of the type listed above have been adopted in the proposed BFN ITS. For example, refer to the BFN ITS Bases for SR 3.6.1.3.7 and 3.6.1.3.8 which correspond to the two STS SRs listed above.

During internal TVA reviews of the ITS, it was noted that the typical language in these 18-month SR Bases could be read as limiting the performance of the SRs to plant outage periods. This is not intended to be the case since for some of the SRs, the current practice is to perform all or portions of the SRs while operating. TVA discussed this matter with the NRC which concurred that the BFN ITS SR Bases provisions as proposed (which retain STS verbiage) do not imply that conduct of the SRs is restricted to outage periods.

There are no commitments contained in this letter. If you have any questions, please contact me at (256) 729-2636.

Sincerely,

T. E. Abney
Manager of Licensing
and Industry Affairs

Subscribed and sworn to before me
on this 28th day of April 1998.

Barbara A. Blanton
Notary Public
My Commission Expires 10/08/98

Enclosures
cc: See page 4

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