



1101 Market Street, Chattanooga, Tennessee 37402

CNL-25-085

July 14, 2025

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Subject: **Browns Ferry Nuclear Plant, Units 1, 2, and 3 – Supplement to License Amendment Request for Adoption of Technical Specifications Task Force Traveler TSTF-423-A, Revision 1 (EPID L-2025-LLA-0070)**

Reference: TVA Letter to NRC, CNL-25-041, "Browns Ferry Nuclear Plant, Units 1, 2, and 3 – License Amendment Request for Adoption of Technical Specifications Task Force (TSTF) Traveler TSTF-423-A, Revision 1, 'Technical Specifications End States, NEDC-32988-A,' Using the Consolidated Line Item Improvement Process (BFN-TS-548)," dated April 10, 2025 (ML25100A124)

In the reference letter, Tennessee Valley Authority (TVA) submitted a request for an amendment to Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3 Technical Specifications (TS) to incorporate the Nuclear Regulatory Commission (NRC)-approved TSTF-423-A, Revision 1.

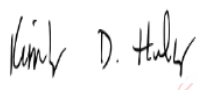
Following submittal of the proposed amendment, inconsistencies were discovered in the proposed changes (markups) to the BFN TS pages. Specifically, the proposed changes to TS 3.6.2.3 Condition E for BFN Units 2 and 3 erroneously deviated from the proposed changes for BFN Unit 1. The proposed change to TS 3.6.2.3 Condition D using "two" instead of "required" is also withdrawn for BFN Units 1, 2, and 3. Additionally, the proposed changes (markups) to TS Bases 3.6.2.3 and 3.7.1 did not accurately describe the applicability of new Required Actions C.1 and E.1, respectively.

Enclosure 1 to this letter provides revised proposed TS changes (markups) for BFN Units 1, 2, and 3. Enclosure 2 to this letter provides revised proposed TS Bases changes (markups) for BFN Unit 1 (BFN Units 2 and 3 changes will be similar). Changes to the existing TS Bases are provided for information only and will be implemented under the Technical Specification Bases Control Program. Revisions to the proposed TS changes and TS Bases changes provided in the reference letter are shown in blue ink.

There are no new regulatory commitments associated with this submittal. Please address any questions regarding this request to Amber V. Aboulfaida, Senior Manager, Fleet Licensing, at avaboulfaida@tva.gov.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 14th day of July 2025.

Respectfully,

 Digitally signed by
Edmondson, Carla
Date: 2025.07.14 09:58:15
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Kimberly D. Hulvey
General Manager, Nuclear Regulatory Affairs & Emergency Preparedness

Enclosures:

1. Revised Proposed Technical Specification Changes (Markups) for BFN Units 1, 2, and 3
2. Revised Proposed Technical Specification Bases Changes (Markups) for BFN Unit 1 (For Information Only)

cc (Enclosures):

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRC Project Manager - Browns Ferry Nuclear Plant
State Health Officer, Alabama Department of Public Health

Enclosure 1

**Revised Proposed Technical Specification Changes (Markups)
for BFN Units 1, 2, and 3**

(5 pages)

3.6 CONTAINMENT SYSTEMS

3.6.2.3 Residual Heat Removal (RHR) Suppression Pool Cooling

LCO 3.6.2.3 Four RHR suppression pool cooling subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR suppression pool cooling subsystem inoperable.	A.1 Restore the RHR suppression pool cooling subsystem to OPERABLE status.	30 days
B. Two RHR suppression pool cooling subsystems inoperable.	B.1 Restore one RHR suppression pool cooling subsystem to OPERABLE status. C.1 NOTE LCO 3.0.4.a is not applicable when entering MODE 3. Be in MODE 3.	7 days OR In accordance with the Risk Informed Completion Time Program
D. Three or more RHR suppression pool cooling subsystems inoperable.	D.1 Restore required RHR suppression pool cooling subsystems to OPERABLE status.	8 hours

(continued)

3.6 CONTAINMENT SYSTEMS

3.6.2.3 Residual Heat Removal (RHR) Suppression Pool Cooling

LCO 3.6.2.3 Four RHR suppression pool cooling subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR suppression pool cooling subsystem inoperable.	A.1 Restore the RHR suppression pool cooling subsystem to OPERABLE status.	30 days
B. Two RHR suppression pool cooling subsystems inoperable.	B.1 Restore one RHR suppression pool cooling subsystem to OPERABLE C.1 ----- NOTE ----- LCO 3.0.4.a is not applicable when entering MODE 3. ----- Be in MODE 3.	7 days OR In accordance with the Risk Informed Completion Time Program
D G. Three or more RHR suppression pool cooling subsystems inoperable.	D G.1 Restore required RHR suppression pool cooling subsystems to OPERABLE status.	8 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E D. Required Action and associated Completion Time not met. of Condition C or D	E D.1 Be in MODE 3.	12 hours
	<u>AND</u> E D.2 Be in MODE 4.	36 hours

3.6 CONTAINMENT SYSTEMS

3.6.2.3 Residual Heat Removal (RHR) Suppression Pool Cooling

LCO 3.6.2.3 Four RHR suppression pool cooling subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One RHR suppression pool cooling subsystem inoperable.	A.1 Restore the RHR suppression pool cooling subsystem to OPERABLE status.	30 days
B. Two RHR suppression pool cooling subsystems inoperable.	B.1 Restore one RHR suppression pool cooling C.1 ----- NOTE ----- LCO 3.0.4.a is not applicable when entering MODE 3. ----- Be in MODE 3.	7 days <u>OR</u> In accordance with the Risk Informed Completion Time Program
D C. Three or more RHR suppression pool cooling subsystems inoperable.	D C.1 Restore required RHR suppression pool cooling subsystems to OPERABLE status.	8 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E D. Required Action and associated Completion Time not met. ↑ of Condition G or D	E D.1 Be in MODE 3. <u>AND</u>	12 hours
	E D.2 Be in MODE 4.	36 hours

Enclosure 2

**Revised Proposed Technical Specification Bases Changes (Markups)
for BFN Unit 1 (For Information Only)**

(2 pages)

BASES

ACTIONS
(continued)

B.1

With two RHR suppression pool cooling subsystems inoperable and at least one RHR suppression pool cooling subsystem OPERABLE, the Completion Time for restoring the remaining two RHR suppression pool cooling subsystems to OPERABLE status is 12 hours. However, the failure could result in a loss of the RHR suppression pool cooling subsystems' capability to provide adequate temperature and pressure mitigation. Completion Time for restoring the remaining two RHR suppression pool cooling subsystems to OPERABLE status is 12 hours.

C.1

If one or two RHR suppression pool cooling subsystems are inoperable and are not restored to OPERABLE status within the required Completion Time, the plant must be brought to a condition in which overall plant risk is minimized. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours.

Remaining in the Applicability of the LCO is acceptable because the plant risk in MODE 3 is similar to or lower than the risk in MODE 4 (Ref. 4) and because the time spent in MODE 3 to perform the necessary repairs to restore the system to OPERABLE status will be short. However, voluntary entry into MODE 4 may be made as it is also an acceptable low-risk state.

Required Action C.1 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 3. This Note prohibits the use of LCO 3.0.4.a to enter MODE 3 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk-assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 3, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

The allowed Completion Time is reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

D 6.1

With three or more RHR suppression pool cooling subsystems inoperable, the required subsystems must be restored to OPERABLE status within 8 hours. In this condition, there is substantial loss of the primary containment pressure and temperature mitigation function. The 8 hour Completion Time is based on this loss of function and is considered acceptable due to the low probability of a DBA and because alternative methods to remove heat from the primary containment are available.

(continued)

BASES

ACTIONS (continued)

F E.1

With three or more required RHRSW pumps inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of pumps must be restored to OPERABLE status within eight hours. The eight hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

G E.1

E.1

If one or two RHRSW subsystems are inoperable or two RHRSW pumps in one or two subsystems are inoperable and not restored within the provided Completion Time, the plant must be brought to a condition in which overall plant risk is minimized. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours.

Remaining in the Applicability of the LCO is acceptable because the plant risk in MODE 3 is similar to or lower than the risk in MODE 4 (Ref. 6) and because the time spent in MODE 3 to perform the necessary repairs to restore the system to OPERABLE status will be short. However, voluntary entry into MODE 4 may be made as it is also an acceptable low-risk state.

Required Action E.1 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 3. This Note prohibits the use of LCO 3.0.4.a to enter MODE 3 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 3, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

The allowed Completion Time is reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

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