

(TS) changes will add an allowed outage time (AOT) for Engineered Safety Features Actuation System (ESFAS) Instrumentation channels to be out of service in a bypassed state.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The addition of an ACTION STATEMENT and the addition of an AOT (and its associated actions if not met) for a TS action statement are neither an accident initiator nor precursor. The ESFAS actuates in response to an accident and has a mitigating function. Increasing the TS requirements for specific TS instrument loops provides additional assurance that the channels will be capable of performing their design function in the event of a DBA [design-basis accident]. The ability of the operations staff to respond to an evaluated accident or plant transient will not be hampered. This change provides conservative requirements to assure that the design basis of the plant is maintained.

Addition of conservative changes to the Engineered Safety Feature Actuation System Instrumentation does not contribute to the initiation of any accident evaluated in the FSAR [Final Safety Analysis Report]. Supporting factors are as follows:

- The changes provide consistency between Tables 3.3-2, 3.3-3, and 4.3-2, resulting in a one-for-one correlation between the functional units in those tables. These changes are conservative and consistent with the Standard Technical Specifications, NUREG-1431, Rev. 2. There are no deletions from the Technical Specifications made by these changes, nor relaxation in any applicability, action, or surveillance requirements.

- Overall plant performance and operation is not altered by the proposed changes. There are to be no plant hardware changes as a result of this proposed change and only minimal procedural changes.

Therefore, since the Engineered Safety Feature Actuation System Instrumentation are treated more conservatively, the probability of occurrence or consequences of an accident evaluated in the VCSNS FSAR will be no greater than the original design basis of the plant.

Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes provide consistency between Tables 3.3-2, 3.3-3, and 4.3-2, resulting in a one-for-one correlation between the functional units in those tables. Additionally, the addition of an ACTION STATEMENT and an AOT with conservative

requirements are intended to assure that the plant is in a safe configuration and can meet accident analyses assumptions. These changes are conservative and consistent with the Improved Technical Specifications, NUREG-1431, Rev. 2. No new accident initiator mechanisms are introduced since:

- No physical changes to the Engineered Safety Feature Actuation System Instrumentation are made.
- No deletions from the Technical Specifications are made.
- No relaxations in any applicability, action, or surveillance requirements are made.

Since the safety and design requirements continue to be met and the integrity of the reactor coolant system pressure boundary is not challenged, no new accident scenarios have been created. Therefore, the types of accidents defined in the FSAR continue to represent the credible spectrum of events to be analyzed, which determine safe plant operation.

3. Does this change involve a significant reduction in margin of safety?

The proposed change requires that an instrument channel for an Engineered Safety Feature remain operable or be restored to operability within a reasonable time period, otherwise a controlled shutdown is required. This conforms to the safety analysis where the plant and its systems, structures and components must be capable of performing the safety function while a DBA is occurring, in the presence of a worst case single failure.

This is not a reduction in a margin of safety, since it restores the margin that was designed into the plant.

The proposed changes provide consistency between Tables 3.3-2, 3.3-3, and 4.3-2, resulting in a one-for-one correlation between the functional units in those tables. These changes are conservative and consistent with the Standard Technical Specifications, NUREG-0452, Rev. 5. The proposed changes impose more restrictive operating limitations, and their use provides increased assurance that the Engineered Safety Feature Actuation System Instrumentation remains operable. Since the changes are conservative additions, it is concluded that the changes do not involve a significant reduction in the margin of safety. This is not a reduction in a margin of safety, since it restores the margin that was designed into the plant.

Pursuant to 10 CFR 50.91, the preceding analyses provides a determination that the proposed Technical Specifications change poses no significant hazard as delineated by 10 CFR 50.92.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Attorney for licensee:* Thomas G. Eppink, South Carolina Electric & Gas Company, Post Office Box 764, Columbia, South Carolina 29218.

*NRC Section Chief:* John A. Nakoski.

*Tennessee Valley Authority (TVA), Docket Nos. 50-259, 50-260, and 50-296, Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3, Limestone County, Alabama*

*Date of amendment request:* February 13, 2003.

*Description of amendment request:* The proposed amendment would revise Technical Specifications (TSs) 4.2.1, Fuel Assemblies, to modify the fuel design description to encompass Framatome Advanced Nuclear Power (FANP) fuel assemblies and also to modify TS 4.3, Fuel Storage, to remove nomenclature specific to Global Nuclear Fuels analysis methods. The proposed TS changes are needed to allow the receipt and storage of Framatome fuel assemblies.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration in accordance with the three standards set forth in 10 CFR 50.92(c), which are presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed amendment revises TS 4.2.1, Fuel Assemblies, to modify the fuel design description to accommodate FANP fuel designs. The change to TS 4.2.1 is administrative and simply adds descriptive text to reflect that FANP fuel assemblies have a water channel.

To make the fuel storage TS compatible with the storage of GNF [Global Nuclear Fuels] and FANP fuel, the proposed amendment also modifies TS 4.3, Fuel Storage, to delete criteria specific to GNF fuel storage criticality analysis methods. BFN criticality analysis and storage requirements continue to be adequately described in the Updated Final Safety Analysis Report (UFSAR) and in existing TS 4.3.1.1.b, TS 4.3.1.1.c, TS 4.3.1.2.b, 4.3.1.2.c, and 4.3.1.2.d. Hence, the proposed elimination of the GNF-specific criteria in TS 4.3 does not affect BFN design basis requirements associated with ensuring adequate criticality margins are maintained for fuel storage.

The requested TS changes do not involve any plant modifications or operational changes that could affect system reliability, performance, or the possibility of operator error. The requested changes do not affect any postulated accident precursors, do not affect accident mitigation systems, and do not introduce any new accident initiation methods. Therefore, the proposed TS change does not involve an increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed changes to TS do not affect the performance of any BFN structure,