

the proposed license amendments and Technical Specification changes do not involve a significant reduction in the margin of safety.

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:* General Counsel, Tennessee Valley Authority, 400 West Summit Hill Drive, ET 11A, Knoxville, Tennessee 37902.

*NRC Section Chief:* Allen G. Howe.

*Tennessee Valley Authority, 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:* April 15, 2003 (TS 409).

*Description of amendment request:*

The proposed amendments are applicable to BFN Units 1, 2, and 3. They would revise Technical Specification (TS) Limiting Condition for Operation 3.7.3, Control Room Emergency Ventilation (CREV) System, and its associated TS Bases to provide specific conditions and required actions that address a degraded main control room boundary. The proposed changes are consistent with the TS Task Force Traveler 287, Revision 5.

*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 proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

2. No. The proposed TS change involves the CREV system, which provides a radiological controlled environment from which the plant can be operated following a design basis accident (DBA). The CREV system is not assumed to be the initiator of any analyzed accident and cannot not [sic] affect the probability of accidents.

The proposed change allows the main control room boundary to be opened intermittently under administrative control, and allows 24 hours to restore the main control room boundary to Operable status before requiring the plant to perform an orderly shutdown. The 24-hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period and TVA's commitment to implement, via administrative controls, appropriate compensatory measures consistent with the intent of 10 CFR part 50, Appendix A, General Design Criteria (GDC)

19. These compensatory measures minimize the consequences of an open main control room boundary and assure that CREV system can continue to perform its function. As such, these changes will not affect the function or operation of any other systems, structures, or components.

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

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

No. The proposed change allows the main control room boundary to be opened intermittently under administrative control and allows 24 hours to restore the main control room boundary to Operable status before requiring the plant to perform an orderly shutdown. The 24-hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period and TVA's commitment to implement, via administrative controls, appropriate compensatory measures consistent with the intent of 10 CFR part 50, Appendix A, GDC 19. These compensatory measures minimize the consequences of an open main control room boundary and assure that the CREV system can continue to perform its function. As such, these changes will not affect the function or operation of any other systems, structures, or components.

Therefore, the proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

No. The proposed change allows the main control room boundary to be opened intermittently under administrative control and allows 24 hours to restore the main control room boundary to Operable status before requiring the plant to perform an orderly shutdown. The 24-hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period and TVA's commitment to implement, via administrative controls, appropriate compensatory measures consistent with the intent of 10 CFR part 50, Appendix A, GDC 19. These compensatory measures minimize the consequences of an open main control room boundary and assure that the CREV system can continue to perform its function such that compliance with GDC 19 is maintained.

Therefore, the proposed TS change does not involve a reduction in the margin of safety.

Based on the above, TVA concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

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:* General Counsel, Tennessee Valley Authority, 400 West Summit Hill Drive, ET 11A, Knoxville, Tennessee 37902.

*NRC Section Chief:* Allen G. Howe.

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

*Date of amendment request:* April 14, 2003 (TS 425).

*Description of amendment request:*

The proposed amendments would revise two Technical Specification (TS) Limiting Conditions for Operation 3.3.4.1, "End Of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation," and 3.7.5, "Main Turbine Bypass System," to reference additional core limits adjustment factors for linear heat generation rate for equipment out-of-service conditions. Also, Section b of TS 5.6.5, "Core Operating Limits Report (COLR)," would be revised to add references to the Framatome Advanced Nuclear Power (FANP) analytical methods that will be used in the upcoming fuel cycles to determine core operating limits. The above TS changes are needed to support a transition to the use of FANP fuel, and FANP core design and analysis services.

*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 proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

No. Core operating limits are established to support requirements, which in turn ensure that fuel design limits are not exceeded during any conditions of operating transients or accidents. The methods used to determine the limits for each operating cycle are based on methods previously found acceptable by the NRC and are required to be listed in COLR TS Section 5.6.5.b. Accordingly, a change to TS Section 5.6.5.b is requested to include FANP methods in the list of NRC-approved methods applicable to BFN. This TS change also adds provisions that ensure core thermal limits adjustment factors are applied for equipment out-of-service conditions associated with the use of FANP methods for transient analyses. The application of these NRC-approved methods will continue to ensure that acceptable operating limits are established and applied for protection of fuel cladding integrity during transient and accidents.

The requested TS changes do not involve any plant modifications or operational changes that could affect system reliability,