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NRC Section Chief: Stephen Dembek.

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

Date of amendment request: July 25, 2003.

Description of amendment request: The proposed amendment would revise Technical Specification (TS) 3.1.8, "Scram Discharge Volume (SDV) Vent and Drain Valves," to allow a vent or drain line with one inoperable valve to be isolated instead of requiring the valve to be restored to Operable status within 7 days.

The NRC staff issued a notice of opportunity for comment in the **Federal Register** on February 24, 2003 (68 FR 8637), on possible amendments to revise the action for one or more SDV vent or drain lines with an inoperable valve, including a model safety evaluation and model no significant hazards consideration (NSHC) determination, using the consolidated line-item improvement process (CLIP). The NRC staff subsequently issued a notice of availability of the models for referencing in license amendment applications in the **Federal Register** on April 15, 2003 (68 FR 18295). The licensee affirmed the applicability of the model NSHC determination in its application dated July 25, 2003.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), an analysis of the issue of no significant hazards consideration is presented below:

Criterion 1—The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

A change is proposed to allow the affected SDV vent and drain line to be isolated when there are one or more SDV vent or drain lines with one valve inoperable instead of requiring the valve to be restored to operable status within 7 days. With one SDV vent or drain valve inoperable in one or more lines, the isolation function would be maintained since the redundant valve in the affected line would perform its safety function of isolating the SDV. Following the completion of the required action, the isolation function is fulfilled since the associated line is isolated. The ability to vent and drain the SDVs is maintained and controlled through administrative controls. This requirement assures the reactor protection system is not adversely affected by the inoperable valves. With the safety functions of the valves being maintained, the probability or consequences of an accident previously evaluated are not significantly increased.

Criterion 2—The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3—The proposed change does not involve a significant reduction in the margin of safety.

The proposed change ensures that the safety functions of the SDV vent and drain valves are fulfilled. The isolation function is maintained by redundant valves and by the required action to isolate the affected line. The ability to vent and drain the SDVs is maintained through administrative controls. In addition, the reactor protection system will prevent filling of an SDV to the point that it has insufficient volume to accept a full scram. Maintaining the safety functions related to isolation of the SDV and insertion of control rods ensures that the proposed change does not involve a significant reduction in the margin of safety.

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 No. 50-390, Watts Bar Nuclear Plant (WBN), Unit 1, Rhea County, Tennessee

Date of amendment request: August 22, 2003.

Description of amendment request: The proposed amendment would revise Technical Specification (TS) 3.3.1, "Reactor Trip System Instrumentation." The revision adds a Surveillance Requirement for response time to the Source Range (SR) Neutron Flux Reactor Trip function.

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

No. The proposed amendment enhances the operability of the SR reactor trip channels by requiring response time testing. This will provide additional assurance that the plant will be operated within its design and licensing basis. The change does not involve any physical modifications or functional design changes to the SR instrumentation,

and will not alter any system interfaces. The design standards, criteria, and material specifications applicable to the design and installation of the SR instrumentation still apply. The performance of response time testing for the SR Neutron Flux channels does not contribute to the initiation of any accident previously evaluated. Testing will be performed when the SR reactor trip function is not required to be operable. A response time will ensure that a Uncontrolled Rod Cluster Control Assembly Bank Withdrawal from Subcritical (RWFS) event in Modes 3, 4, or 5 remains bounded by the current analysis and the reactor would be shutdown before any significant power is generated. Thus, the probability of occurrence of an accident evaluated in the Updated Final Safety Analysis Report (UFSAR) will not increase as a result of the performance of response time testing. The performance of response time testing will not affect any radiological barriers. The testing will not alter any operator responses required for accident mitigation and will not change any assumptions made in evaluating radiological consequences of an accident described in the UFSAR. The consequences of an RWFS event occurring from Mode 3, 4, or 5 are less severe than from Mode 2 since reactivity levels are lower in the lower modes. Therefore, there is no potential for an increase in the consequences of any previously evaluated accident.

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

No. The proposed change will not require any changes to hardware, setpoints, or design functions. The addition of a response time test requirement will not change the way the system is operated but will impose more restrictive operability requirements for the SR reactor trip function. This enhancement to the operability requirements for a protection system function is not considered an accident initiator. Therefore, the activity will not create a new or different kind of accident from those previously evaluated in the UFSAR.

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

No. The proposed change does not involve any changes to setpoints or safety limits. The required response time is consistent with the current accident analysis described in UFSAR and will ensure that a RWFS event in Modes 3, 4, or 5 remains bounded by the current analysis. The addition of a response time verification requirement is an enhancement to the operability requirements of the SR reactor trip channels and does not reduce 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,