Docket Nos. 50-327 and 50-328

July 5, 1989

Mr. Oliver D. Kingsley, Jr. Senior Vice President, Nuclear Power Tennessee Valley Authority 6N 38A Lookout Place 1101 Market Street Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: INDEPENDENT SAFETY ENGINEERING GROUP (TAC 72957/72958) (TS 89-16) SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2

The Commission has issued the enclosed Amendment No. $119\,$ to Facility Operating License No. DPR-77 and Amendment No. 108 to Facility Operating License No. DPR-79 for the Sequoyah Nuclear Plant, Units 1 and 2, respectively. These amendments are in response to your application dated April 17, 1989.

The amendments revise Section 6, Administrative Controls, of the Sequoyah Nuclear Plant, Units 1 and 2, Technical Specifications (TS). The changes to Specifications 6.2.3.2 and 6.2.3.4, for the Independent Safety Engineering Group (ISEG), limit the group to five full-time engineers and have the group report its recommendations to the Manager of Nuclear Managers Review Group. The ISEG is also renamed to Independent Safety Engineering (ISE).

By phone conference calls dated June 12 and 15, 1989, the Tennessee Valley Authority (TVA) requested that these amendments become effective 60 days after the date of their issuance. This is to allow TVA time to implement the reorganization of the ISE group. This is acceptable to the staff.

A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

Original signed by

Suzanne Black, Assistant Director for Projects TVA Projects Division Nuclear Peactor Regulation

Enclosures: 1. Amendment No. 119 to License No. DPR-77 Amendment No. 108 to License No. DPR-79 Safety Evaluation

cc w/enclosures: See next page

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Mr. John L. LaPoint Site Director Sequoyah Nuclear Plant Tennessee Valley Authority P. O. Box 2000 Soddy Daisy, Tennessee 37379

Mr. M. Burzynski Acting Site Licensing Manager Sequoyah Nuclear Plant P. O. Box 2000 Soddy Daisy, Tennessee 37379

County Judge Hamilton County Courthouse Chattanooga, Tennessee 37402

Regional Administrator, Region II U.S. Nuclear Regulatory Commission 101 Marietta Street, N.W. Atlanta, Georgia 30323 Mr. Kenneth M. Jenison Senior Resident Inspector Sequoyah Nuclear Plant U.S. Nuclear Regulatory Commission 2600 Igou Ferry Road Soddy Daisy, Tennessee 37379

Mr. Michael H. Mobley, Director Division of Radiological Health T.E.R.R.A. Building, 6th Floor 150 9th Avenue North Nashville, Tennessee 37219-5404

Dr. Henry Myers, Science Advisor Committee on Interior and Insular Affairs U.S. House of Representatives Washington, D.C. 20515

Tennessee Valley Authority Rockville Office 11921 Rockville Pike Suite 402 Rockville, Maryland 20852



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-327

SEQUOYAH NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 119 License No. DPR-77

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Tennessee Valley Authority (the licensee) dated April 17, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission:
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-77 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as regised through Amendment No. 119, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective 60 days after its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Suzanne Black, Assistant Director

for Projects
TVA Projects Division

Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: July 5, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 119

FACILITY OPERATING LICENSE NO. DPR-77

DOCKET NO. 50-327

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. Overleaf pages* are provided to maintain document completeness.

REMOVE	INSERT
6-5	6-5
6-6	6-6*

6.2.3 INDEPENDENT SAFETY ENGINEERING (ISE)

FUNCTION

6.2.3.1 The ISE shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISE shall be composed of at least 3 dedicated full-time engineers located onsite. These engineers will be supplemented as necessary by full-time engineers shared among all TVA nuclear sites to achieve an equivalent staffing of 5 full-time engineers performing the ISE functions applicable to Sequoyah.

RESPONSIBILITIES

6.2.3.3 The ISE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Manager of Nuclear Managers Review Group.

6.2.4 SHIFT TECHNICAL ADVISOR (STA)

6.2.4.1 The STA shall serve in an advisory capacity to the shift supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, except for the Site Radiological Control Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

^{*}Not responsible for sign-off function.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Operations Superintendent and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

 $6.5.0\,$ The Senior Vice President, Nuclear Power is responsible for the safe operation of all TVA power plants.

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:

Plant Manager

Member:

Operations Superintendent

Member:

Operations Manager

Member:

Site Radiological Control Superintendent

Member:

Maintenance Superintendent

Member:

Technical Support Superintendent

Member:

Quality Engineering Manager

Member:

Division of Nuclear Engineering Representative



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-328

SEQUOYAH NUCLEAR PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 108 License No. DPR-79

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Tennessee Valley Authority (the licensee) dated April 17, 1989, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission:
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-79 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 108, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective 60 days after its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Suzanne Black, Assistant Director

for Projects

TVA Projects Division

Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: July 5, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 108

FACILITY OPERATING LICENSE NO. DPR-79

DOCKET NO. 50-328

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the enclosed pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change. Overleaf pages* are provided to maintain document completeness.

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6-6	6-6*

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RESPONSIBILITIES

6.2.3.3 The ISE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Manager of Nuclear Managers Review Group.

6.2.4 SHIFT TECHNICAL ADVISOR (STA)

6.2.4.1 The STA shall serve in an advisory capacity to the shift supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit.

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6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Operations Superintendent and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

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Member:

Operations Superintendent

Member:

Operations Manager

Member:

Site Radiological Control Superintendent

Member:

Maintenance Superintendent

Member:

Technical Support Superintendent

Member:

Quality Engineering Manager

Member:

Division of Nuclear Engineering Representative



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

ENCLOSURE 3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 119 TO FACILITY OPERATING LICENSE NO. DPR-77

AND AMENDMENT NO. 108 TO FACILITY OPERATING LICENSE NO. DPR-79

TENNESSEE VALLEY AUTHORITY

SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

1.0 INTRODUCTION

By letter dated April 17, 1989, the Tennessee Valley Authority (TVA) proposed changes to Section 6, Administrative Controls, of the Sequoyah Nuclear Plant, Units 1 and 2, Technical Specifications (TS). The proposed changes are to revise Specifications 6.2.3.2 and 6.2.3.4 to reflect the current restructuring of TVA's nuclear power organization. The proposed administrative change specifically addresses the Independent Safety Engineering Group (ISEG) with regard to site and corporate staffing and the corporate official to whom ISEG makes recommendations. The ISEG would provide its recommendations to the Manager of the Nuclear Manager's Review Group instead of the current Director of Nuclear Licensing and Regulatory Affairs. In addition, TVA is proposing to rename ISEG to Independent Safety Engineering (ISE).

By phone conference calls on June 12 and 15, 1989, TVA clarified their proposed change to Specification 6.2.3.2 by revising the proposed phrase "to achieve a staffing of 5 engineers" to read instead "to achieve an equivalent staffing of 5 full-time engineers performing ISE functions applicable to Sequoyah." This clarification, for the TS changes being proposed by TVA, did not change (1) the substance of the proposed action in the Federal Register Notice (54 FR 21316) published on May 17, 1989 or (2) the staff's initial determination of no significant hazards consideration in that notice.

2.0 BACKGROUND

In its letter dated April 17, 1979, TVA stated that organizational changes within its nuclear power organization would place ISEG within the Nuclear Manager's Review Group under the newly formed Nuclear Assurance and Services Organization (NASO). This was discussed in the meeting of April 10, 1989 with TVA. The meeting summary was issued by the staff on April 26, 1989. This summary includes organization charts in the handout from TVA in the meeting.

This organization realignment would have the ISEG submit their recommendations to the Manager of the Nuclear Manager's Review Group instead of the current TS requirement to the Director of Nuclear Licensing and Regulatory Affairs.

TVA stated in its application that this new organization will continue to provide the appropriate level of independence with respect to ISEG's review and auditing functions. It will continue to perform onsite independent reviews of plant operations. It will continue to comply with NUREG-0737 requirements that it reports to a high-level corporate official in a technically oriented position not in the management chain for power production.

TVA further stated that the proposed change to the composition of the ISEG clarifies the staffing requirements if more than three full-time engineers are assigned at both the Sequoyah and Browns Ferry sites. The manager of ISEG would be located at the TVA corporate offices and would serve a generic function to support both TVA operating plant sites, Sequoyah and Browns Ferry.

3.0 EVALUATION

The staff has reviewed TVA's application dated April 17, 1989. The requirements for the ISEG were established in Section I.B.1.2 of NUREG-0737, "Clarification of TMI Action Plan Requirements," dated November 1980.

The proposed changes do not affect the functions or the responsibilities of The composition of ISEG in Specification 6.2.3.2 is proposed to be changed to (1) delete the reference to a specific number of full-time engineers shared among all the TVA nuclear sites and (2) add a reference to full-time engineers shared among all the TVA sites, as necessary, to achieve a staffing of five engineers. The intent of this proposed change was discussed with TVA by phone conference calls on June 12 and 15, 1989. The staff stated that it was not clear that there would be the equivalent of five full-time engineers performing the ISEG function and responsibilities for Sequoyah. TVA stated that its intent was to have the equivalent of five full-time engineers performing the ISEG function and responsibilities for Sequoyah as required in NUREG-0737. There would be at least three dedicated full-time engineers located onsite at Sequoyah and additional engineers offsite to have the equivalent of five full-time engineers for Sequoyah. TVA stated that, to clarify its intent, they propose for Specification 6.2.3.2 that the engineers unsite "will be supplemented as necessary by full-time engineers shared among all TVA nuclear sites to achieve an equivalent staffing of five full-time engineers performing ISE functions applicable to Sequoyah." This clarification by TVA assures that there will be an equivalent of five full-time engineers in the group for Because this specification requires that at least three engineers will be located onsite, engineers would also be located offsite to have the staffing of an equivalent of five full-time engineers for ISEG. The manager of ISEG is located at the TVA corporate offices. This proposed change maintains the requirement of five-full time engineers in ISEG in the TS and meets the requirement of a minimum of five full-time engineers for ISEG in NUREG-0737; therefore, we conclude that this change is acceptable.

The authority of ISEG in Specification 6.2.3.4 is proposed to be changed to state that the group will make its recommendations to the Manager of Nuclear Managers Review Group, instead of the Director of Nuclear Licensing and Regulatory Affairs. TVA explained in the meeting of April 10, 1989 that ISEG is being relocated into the new NASO and it will report to the Manager of Nuclear Manager's Review Group. This manager is separate from the quality

assurance function of NASO and is at a corporate level equal to the Director of Nuclear Licensing and Regulatory Affairs, both report to Vice Presidents in the TVA Nuclear Power Organization.

Therefore, in accordance with NUREG-0737, the ISEG reports to a TVA corporate official who holds a high-level, technically oriented position that is not in the management chain for power production and is not an integral part of the quality assurance function in the TVA Nuclear Power organization. Therefore, we conclude that the change is acceptable.

TVA has also proposed to change the name of ISEG to Independent Safety Engineering (ISE). This change is an administrative change and does not affect the function and responsibilities of the ISEG. We conclude that this proposed change is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the <u>Federal Register</u> (54 FR 21316) on May 17, 1989 and consulted with the State of Tennessee. No public comments were received and the State of Tennessee did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendments will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: Jack Donohew

Dated: July 5, 1989