

UNITED STATES
NUCLEAR REGULATORY COMMISSION
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June 19, 1989

Docket Nos. 50-327
and 50-328Posted
Amndt 117
to DPR-77

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: RADIOIODINE REPORTING REQUIREMENTS (GENERIC LETTER 85-19)
(TAC 71980/71981) (TS 88-31) - SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2

The Commission has issued the enclosed Amendment No. 117 to Facility Operating License No. DPR-77 and Amendment No. 107 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 January 27, 1989.

The amendments modify the Sequoyah Nuclear Plant, Units 1 and 2, Technical Specifications (TS). The changes affect the actions taken when the plant is not in compliance with the limiting condition for operation (LCO) 3.4.8, Specific Activity, for radioiodine in the reactor coolant system (RCS). The changes (1) delete Action "a" for Modes 1, 2 and 3, eliminating the reporting requirement for the number of hours above the allowable dose equivalent Iodine 131 (I-131) limit; (2) delete the part of Action "a" for Modes 1, 2, 3, 4 and 5 that involves the special report requirement for I-131 and add an additional reporting requirement in TS Section 6.9, Annual Reports, to include an annual report to NRC regarding instances when the I-131 specific activity limit was exceeded; and (3) delete the discussion within the Bases Section 3/4.4.8, Specific Activity, of the reporting requirement for operation in excess of 500 hours above the dose limit in a 6-month period.

These amendments implement the changes in RCS radioiodine reporting requirements in Generic Letter (GL) 85-19. Even though these reporting requirements are being reduced, you are expected to continue monitoring the RCS radioiodine activity and take actions to keep the accumulated time with high activity less than 800 hours in a 12-month period.

Mr. Oliver D. Kingsley, Jr.

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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
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No.117 to License No. DPR-77
- 2. Amendment No.107 to License No. DPR-79
- 3. Safety Evaluation

cc w/enclosures:
See next page

DISTRIBUTION:

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OFFICE	RR:TVA/LA	:NRR:TVA/PM	:NRR:TVA/BC	:TVA:AD/TP	:OGC	:TVA:AD/P	:
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DATE	:6/10/89	:5/1/89	:6/5/89	:5/1/89	:6/17/89	:6/19/89	

Mr. Oliver D. Kingsley, Jr.

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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. 117
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 January 27, 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.

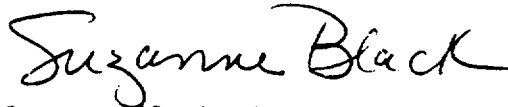
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-77 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 117, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of 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: June 19, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 117

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.

<u>REMOVE</u>	<u>INSERT</u>
3/4 4-19	3/4 4-19
3/4 4-20	3/4 4-20
B 3/4 4-5	B 3/4 4-5
6-17	6-17*
6-18	6-18
6-19	6-19
6-20	6-20
6-21	6-21
6-22	6-22

REACTOR COOLANT SYSTEM

3/4.4.8 SPECIFIC ACTIVITY

LIMITING CONDITION FOR OPERATION

3.4.8 The specific activity of the primary coolant shall be limited to:

- a. Less than or equal to 1.0 microcuries/gram DOSE EQUIVALENT I-131, and
- b. Less than or equal to $100/E$ microcuries/gram.

APPLICABILITY: MODES 1, 2, 3, 4 and 5

ACTION:

MODES 1, 2 and 3*

- a. With the specific activity of the primary coolant greater than 1.0 microcuries/gram DOSE EQUIVALENT I-131 for more than 48 hours during one continuous time interval or exceeding the limit line shown on Figure 3.4-1, be in at least HOT STANDBY with T_{avg} less than 500°F within 6 hours.
- b. With the specific activity of the primary coolant greater than $100/E$ microcuries/gram, be in at least HOT STANDBY with T_{avg} less than 500°F within 6 hours.

MODES 1, 2, 3, 4 and 5

- a. With the specific activity of the primary coolant greater than 1.0 microcuries/gram DOSE EQUIVALENT I-131 or greater than $100/E$ microcuries/gram, perform the sampling and analysis requirements of item 4a of Table 4.4-4 until the specific activity of the primary coolant is restored to within its limits.

*With T_{avg} greater than or equal 500°F.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS

4.4.8 The specific activity of the primary coolant shall be determined to be within the limits by performance of the sampling and analysis program of Table 4.4-4.

REACTOR COOLANT SYSTEM

BASES

The surveillance requirements provide adequate assurance that concentrations in excess of the limits will be detected in sufficient time to take corrective action.

3/4.4.8 SPECIFIC ACTIVITY

The limitations on the specific activity of the primary coolant ensure that the resulting 2 hour doses at the site boundary will not exceed an appropriately small fraction of Part 100 limits following a steam generator tube rupture accident in conjunction with an assumed steady state primary-to-secondary steam generator leakage rate of 1.0 GPM. The values for the limits on specific activity represent interim limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters of the Sequoyah Nuclear Plant site, such as site boundary location and meteorological conditions, were not considered in this evaluation.

The ACTION statement permitting POWER OPERATION to continue for limited time periods with the primary coolant's specific activity greater than or equal to 1.0 microcuries/gram DOSE EQUIVALENT I-131, but within the allowable limit shown on Figure 3.4-1, accommodates possible iodine spiking phenomenon which may occur following changes in THERMAL POWER. Operation with specific activity levels exceeding 1.0 microcuries/gram DOSE EQUIVALENT I-131 but within the limits shown on Figure 3.4-1 should be limited to no more than 800 hours per year since the activity levels allowed by Figure 3.4-1 increase the 2-hour thyroid dose at the site boundary by a factor of up to 20 following a postulated steam generator tube rupture.

Reducing T_{avg} to less than 500°F prevents the release of activity should a steam generator tube rupture since the saturation pressure of the primary coolant is below the lift pressure of the atmospheric steam relief valves. The surveillance requirements provide adequate assurance that excessive specific activity levels in the primary coolant will be detected in sufficient time to take corrective action. Information obtained on iodine spiking will be used to assess the parameters associated with spiking phenomena. A reduction in frequency of isotopic analyses following power changes may be permissible if justified by the data obtained.

ADMINISTRATIVE CONTROLS

d. Backup Method for Determining Subcooling Margin

A program which will ensure the capability to accurately monitor the Reactor Coolant System Subcooling Margin. This program shall include the following:

- (i) Training of personnel, and
- (ii) Procedures for monitoring.

e. Postaccident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS^{1/}

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include a tabulation on an annual basis for the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

If the results of specific activity analysis in which the primary coolant exceeded the limits of specification 3.4.8.a, then the following information shall be included along with the results of specific activity analysis results in which the primary coolant exceeded the limits of the specifications:

(1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

^{2/} This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT^{1/}

6.9.1.6 The radiological environmental operating reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year.

6.9.1.7 The annual radiological environmental operating reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2 and a listing of the new locations for dose calculations and/or environmental monitoring identified by the land use census. If harmful effects or evidence of irreversible damage are detected by the monitoring, the report shall provide an analysis of the problems and a planned course of action to alleviate the problem.

The annual radiological environmental operating reports shall include summarized and tabulated results in the format of Regulatory Guide 4.8, December 1975 of all radiological environmental samples taken during the report period. In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; a map of all sampling locations keyed to a table giving distances and directions from one reactor; and the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.12.3.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT^{1/}

6.9.1.8 The semiannual radioactive effluent release report covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

6.9.1.9 Semiannual radioactive effluent release reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

The annual radioactive effluent release report (Radiological Impact) to be submitted 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing of wind speed, wind direction, atmospheric stability, and precipitation (if measured) on magnetic tape, or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.* This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to members of the public due to their activities inside the site boundary (Figure 5.1-1) during the report period. All assumptions used in making these assessments (i.e., specific activity, exposure time and location) shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents (as determined by sampling frequency and measurement) shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

The annual radioactive effluent release report to be submitted after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed members of the public from reactor releases and other nearby uranium fuel cycle sources (including doses from primary effluent pathways and direct radiation) for the previous calendar year to show conformance with 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1.

The semiannual radioactive effluent release reports shall include the following information for each type of solid waste identified in Regulatory Guide 1.21, Rev. 1, Table 3, Part A, which is shipped offsite during the report period:

- a. Total volume of containers,
- b. Total curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclides (specify whether determined by measurement or estimate),
- d. Type of quantity (e.g., LSA, Type A, Type B, etc.)

The semiannual radioactive effluent release reports shall include unplanned releases from the site to unrestricted areas of radioactive materials in gaseous and liquid effluents on a quarterly basis and shall include any changes to the PROCESS CONTROL PROGRAM (PCP) and the Offsite Dose Calculation Manual (ODCM) made during the reporting period. It shall include the type of solidification agent used, if applicable.

*In lieu of submission with the annual radioactive effluent release report, this summary of required meteorological data may be retained on site in a file that shall be provided to NRC upon request.

ADMINISTRATIVE CONTROLS

MONTHLY REACTOR OPERATING REPORT

6.9.1.10 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or Safety Valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

Any changes to the OFFSITE DOSE CALCULATION MANUAL shall be submitted with the Monthly Operating Report within 90 days in which the change(s) was made effective. In addition, a report of any major changes to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the evaluation was reviewed and accepted by the PORC.

RADIAL PEAKING FACTOR LIMIT REPORT

6.9.1.14 The $W(z)$ function for normal operation shall be provided at least 60 days prior to cycle initial criticality. In the event that these values would be submitted at some other time during core life, it will be submitted 60 days prior to the date the values would become effective unless otherwise exempted by the Commission.

Any information needed to support $W(z)$ will be by request from the NRC and need not be included in this report.

SPECIAL REPORTS

6.9.2.1 Special reports shall be submitted within the time period specified for each report, in accordance with 10 CFR 50.4.

6.9.2.2 Diesel Generator Reliability Improvement Program

As a minimum the Reliability Improvement Program report for NRC audit, required by LCO 3.8.1.1, Table 4.8-1, shall include:

- (a) a summary of all tests (valid and invalid) that occurred within the time period over which the last 20/100 valid tests were performed
- (b) analysis of failures and determination of root causes of failures
- (c) evaluation of each of the recommendations of NUREG/CR-0660, "Enhancement of Onsite Emergency Diesel Generator Reliability in Operating Reactors," with respect to their application to the Plant
- (d) identification of all actions taken or to be taken to 1) correct the root causes of failures defined in b) above and 2) achieve a general improvement of diesel generator reliability
- (e) the schedule for implementation of each action from d) above
- (f) an assessment of the existing reliability of electric power to engineered-safety-feature equipment

ADMINISTRATIVE CONTROLS

Diesel Generator Reliability Improvement Program (Continued)

A supplemental report shall be prepared within 30 days after each subsequent failure during a valid demand for so long as the affected diesel generator unit continues to violate the criteria (3/20 or 6/100) for the reliability improvement program remedial action. The supplemental report need only update the failure/demand history for the affected diesel generator unit since the last report for that diesel generator. The supplemental report shall also present an analysis of the failure(s) with a root cause determination, if possible, and shall delineate any further procedural, hardware or operational changes to be incorporated into the diesel generator improvement program and the schedule for implementation of those changes.

In addition to the above, submit a yearly data report on the diesel generator reliability.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1 and 6.8.4.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.



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. 107
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 January 27, 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.

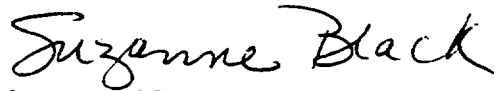
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-79 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 107, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of 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: June 19, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 107

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.

<u>REMOVE</u>	<u>INSERT</u>
3/4 4-23	3/4 4-23*
3/4 4-24	3/4 4-24
3/4 4-25	3/4 4-25
3/4 4-26	3/4 4-26*
B 3/4 4-5	B 3/4 4-5
6-17	6-17*
6-18	6-18
6-19	6-19
6-20	6-20
6-21	6-21
6-22	6-22

TABLE 4.4-3
REACTOR COOLANT SYSTEM
CHEMISTRY LIMITS SURVEILLANCE REQUIREMENTS

<u>PARAMETER</u>	<u>SAMPLE AND ANALYSIS FREQUENCY</u>
DISSOLVED OXYGEN*	At least once per 72 hours
CHLORIDE	At least once per 72 hours
FLUORIDE	At least once per 72 hours

*Not required with T_{avg} less than or equal to 250°F

REACTOR COOLANT SYSTEM

3/4.4.8 SPECIFIC ACTIVITY

LIMITING CONDITION FOR OPERATION

3.4.8 The specific activity of the primary coolant shall be limited to:

- a. Less than or equal to 1.0 microcurie per gram DOSE EQUIVALENT I-131, and
- b. Less than or equal to $100/\bar{E}$ microcuries per gram.

APPLICABILITY: MODES 1, 2, 3, 4 and 5

ACTION:

MODES 1, 2 and 3*:

- a. With the specific activity of the primary coolant greater than 1.0 microcurie per gram DOSE EQUIVALENT I-131 for more than 48 hours during one continuous time interval or exceeding the limit line shown on Figure 3.4-1, be in at least HOT STANDBY with T_{avg} less than 500°F within 6 hours.
- b. With the specific activity of the primary coolant greater than $100/\bar{E}$ microcurie per gram, be in at least HOT STANDBY with T_{avg} less than 500°F within 6 hours.

MODES 1, 2, 3, 4 and 5:

- a. With the specific activity of the primary coolant greater than 1.0 microcurie per gram DOSE EQUIVALENT I-131 or greater than $100/\bar{E}$ microcuries per gram, perform the sampling and analysis requirements of item 4a of Table 4.4-4 until the specific activity of the primary coolant is restored to within its limits.

* With T_{avg} greater than or equal to 500°F.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS

4.4.8 The specific activity of the primary coolant shall be determined to be within the limits by performance of the sampling and analysis program of Table 4.4-4.

TABLE 4.4-4

PRIMARY COOLANT SPECIFIC ACTIVITY SAMPLE
AND ANALYSIS PROGRAM

<u>TYPE OF MEASUREMENT AND ANALYSIS</u>	<u>SAMPLE AND ANALYSIS FREQUENCY</u>	<u>MODES IN WHICH SAMPLE AND ANALYSIS REQUIRED</u>
1. Gross Activity Determination	At least once per 72 hours	1, 2, 3, 4
2. Isotopic Analysis for DOSE EQUIVALENT I-131 Concentration	1 per 14 days	1
3. Radiochemical for \bar{E} Determination	1 per 6 months*	1
4. Isotopic Analysis for Iodine Including I-131, I-133, and I-135	a) Once per 4 hours, whenever the specific activity exceeds 1.0 $\mu\text{Ci}/\text{gram}$ DOSE EQUIVALENT I-131 or $100/\bar{E}$ $\mu\text{Ci}/\text{gram}$, and	1 [#] , 2 [#] , 3 [#] , 4 [#] , 5 [#]
	b) One sample between 2 and 6 hours following a THERMAL POWER change exceeding 15 percent of the RATED THERMAL POWER within a one hour period.	1, 2, 3

[#]Until the specific activity of the primary coolant system is restored within its limits.

*Sample to be taken after a minimum of 2 EFPD and 20 days of POWER OPERATION have elapsed since the reactor was last subcritical for 48 hours or longer.

REACTOR COOLANT SYSTEM

BASES

3/4.4.7 CHEMISTRY

The limitations on Reactor Coolant System chemistry ensure that corrosion of the Reactor Coolant System is minimized and reduces the potential for Reactor Coolant System leakage or failure due to stress corrosion. Maintaining the chemistry within the Steady State Limits provides adequate corrosion protection to ensure the structural integrity of the Reactor Coolant System over the life of the plant. The associated effects of exceeding the oxygen, chloride and fluoride limits are time and temperature dependent. Corrosion studies show that operation may be continued with contaminant concentration levels in excess of the Steady State Limits, up to the Transient Limits, for the specified limited time intervals without having a significant effect on the structural integrity of the Reactor Coolant System. The time interval permitting continued operation within the restrictions of the Transient Limits provides time for taking corrective actions to restore the contaminant concentrations to within the Steady State Limits.

The surveillance requirements provide adequate assurance that concentrations in excess of the limits will be detected in sufficient time to take corrective action.

3/4.4.8 SPECIFIC ACTIVITY

The limitations on the specific activity of the primary coolant ensure that the resulting 2-hour doses at the site boundary will not exceed an appropriately small fraction of Part 100 limits following a steam generator tube rupture accident in conjunction with an assumed steady state primary-to-secondary steam generator leakage rate of 1.0 GPM. The values for the limits on specific activity represent limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters of the Sequoyah site, such as site boundary location and meteorological conditions, were not considered in this evaluation.

The ACTION statement permitting POWER OPERATION to continue for limited time periods with the primary coolant's specific activity greater than 1.0 microcuries/gram DOSE EQUIVALENT I-131, but within the allowable limit shown on Figure 3.4-1, accommodates possible iodine spiking phenomenon which may occur following changes in THERMAL POWER. Operation with specific activity levels exceeding 1.0 microcuries/gram DOSE EQUIVALENT I-131 but within the limits shown on Figure 3.4-1 should be limited to no more than 800 hours per year since the activity levels allowed by Figure 3.4-1 increase the 2-hour thyroid dose at the site boundary by a factor of up to 20 following a postulated steam generator tube rupture.

ADMINISTRATIVE CONTROLS

e. Postaccident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS^{1/}

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include a tabulation on an annual basis for the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,^{2/} e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

If the results of specific activity analysis in which the primary coolant exceeded the limits of specification 3.4.8.a, then the following information shall be included along with the results of specific activity analysis results in which the primary coolant exceeded the limits of the specifications:

(1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

^{2/} This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT^{1/}

6.9.1.6 The radiological environmental operating report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year.

6.9.1.7 The annual radiological environmental operating reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2, and a listing of the new locations for dose calculations and/or environmental monitoring identified by the land use census. If harmful effects or evidence of irreversible damage are detected by the monitoring, the report shall provide an analysis of the problems and a planned course of action to alleviate the problem.

The annual radiological environmental operating reports shall include summarized and tabulated results in the format of Regulatory Guide 4.8, December 1975 of all radiological environmental samples taken during the report period. In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; a map of all sampling locations keyed to a table giving distances and directions from one reactor; and the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.12.3.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT^{1/}

6.9.1.8 The semiannual radioactive effluent release report covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

6.9.1.9 Semiannual radioactive effluent release reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

The annual radioactive effluent release report (Radiological Impact) to be submitted 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing of wind speed, wind direction, atmospheric stability, and precipitation (if measured) on magnetic tape, or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.* This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to members of the public due to their activities inside the site boundary (Figure 5.1-1) during the report period. All assumptions used in making these assessments (i.e., specific activity, exposure time and location) shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents (as determined by sampling frequency and measurement) shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

The annual radioactive effluent release report to be submitted after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed members of the public from reactor releases and other nearby uranium fuel cycle sources (including doses from primary effluent pathways and direct radiation) for the previous calendar year to show conformance with 40 CFR 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109, Rev. 1.

The semiannual radioactive effluent release reports shall include the following information for each type of solid waste identified in Regulatory Guide 1.21, Rev. 1, Table 3, Part A, which is shipped offsite during the report period:

- a. Total volume of containers,
- b. Total curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclides (specify whether determined by measurement or estimate),
- d. Type of quantity (e.g., LSA, Type A, Type B, etc.)

The semiannual radioactive effluent release reports shall include unplanned releases from the site to unrestricted areas of radioactive materials in gaseous and liquid effluents on a quarterly basis, and shall include any changes to the PROCESS CONTROL PROGRAM (PCP) and the Offsite Dose Calculation Manual (ODCM) made during the reporting period. It shall include the type of solidification agent used, if applicable.

* In lieu of submission with the annual radioactive effluent release report this summary of required meteorological data may be retained on site in a file that shall be provided the NRC upon request.

ADMINISTRATIVE CONTROLS

MONTHLY REACTOR OPERATING REPORT

6.9.1.10 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or Safety Valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

Any changes to the OFFSITE DOSE CALCULATION MANUAL shall be submitted with the Monthly Operating Report within 90 days in which the change(s) was made effective. In addition, a report of any major changes to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the evaluation was reviewed and accepted by the PORC.

RADIAL PEAKING FACTOR LIMIT REPORT

6.9.1.14 The $W(z)$ function for normal operation shall be provided at least 60 days prior to cycle initial criticality. In the event that these values would be submitted at some other time during core life, it will be submitted 60 days prior to the date the values would become effective unless otherwise exempted by the Commission.

Any information needed to support $W(z)$ will be by request from the NRC and need not be included in this report.

SPECIAL REPORTS

6.9.2.1 Special reports shall be submitted within the time period specified for each report, in accordance with 10 CFR 50.4.

6.9.2.2 Diesel Generator Reliability Improvement Program

As a minimum the Reliability Improvement Program report for NRC audit, required by LCO 3.8.1.1, Table 4.8-1, shall include:

- (a) a summary of all tests (valid and invalid) that occurred within the time period over which the last 20/100 valid tests were performed
- (b) analysis of failures and determination of root causes of failures
- (c) evaluation of each of the recommendations of NUREG/CR-0660, "Enhancement of Onsite Emergency Diesel Generator Reliability in Operating Reactors," with respect to their application to the Plant
- (d) identification of all actions taken or to be taken to 1) correct the root causes of failures defined in b) above and 2) achieve a general improvement of diesel generator reliability
- (e) the schedule for implementation of each action from d) above
- (f) an assessment of the existing reliability of electric power to engineered-safety-feature equipment

ADMINISTRATIVE CONTROLS

Diesel Generator Reliability Improvement Program (Continued)

A supplemental report shall be prepared within 30 days after each subsequent failure during a valid demand for so long as the affected diesel generator unit continues to violate the criteria (3/20 or 6/100) for the reliability improvement program remedial action. The supplemental report need only update the failure/demand history for the affected diesel generator unit since the last report for that diesel generator. The supplemental report shall also present an analysis of the failure(s) with a root cause determination, if possible, and shall delineate any further procedural, hardware or operational changes to be incorporated into the diesel generator improvement program and the schedule for implementation of those changes.

In addition to the above, submit a yearly data report on the diesel generator reliability.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specification 6.8.1 and 6.8.4.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.



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

ENCLOSURE 3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 117 TO FACILITY OPERATING LICENSE NO. DPR-77

AND AMENDMENT NO. 107 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 January 27, 1989, the Tennessee Valley Authority (TVA) proposed to modify the Sequoyah Nuclear Plant, Units 1 and 2, Technical Specifications (TS). The changes affect the limiting condition for operation (LCO) 3.4.8, Specific Activity, for radioiodine in the reactor coolant system (RCS). The proposed changes would (1) delete Action "a" for Modes 1, 2 and 3, eliminating the reporting requirement for the number of hours above the allowable dose equivalent Iodine 131 (I-131) limit; (2) delete the part of Action "a" for Modes 1, 2, 3, 4 and 5 that involves the special report requirement for I-131 and propose an additional requirement in TS Section 6.9, Annual Reports, to include an annual report to NRC regarding instances when the I-131 specific activity limit was exceeded; and (3) delete the discussion within the Bases sections for TS 3/4.4.8, Specific Activity, of the shutdown requirement for operation in excess of 800 hours above the dose limit in a 12-month period and reporting requirement for operation in excess of 500 hours above the dose limit in a 6-month period.

TVA stated in its application that it was requesting these changes to reduce unnecessary reporting requirements and remove an unnecessary shutdown requirement, in the TS. These changes were proposed to implement the guidance in Generic Letter (GL) 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes," dated September 27, 1985.

2.0 EVALUATION

As part of the staff's continuing program to delete unnecessary requirements in the TS, it reviewed the reporting requirements related to primary coolant specific activity levels, specifically primary coolant iodine spikes. The staff determined that the reporting requirements for iodine spiking can be reduced from a short-term report (Special Report or Licensee Event Report) to an item which is to be included in the Annual Report. The information to be included in the Annual Report is similar to that previously required in the Licensee Event Report but has been changed to more clearly designate the results to be included from the specific activity analysis and to delete the information regarding fuel burnup by core region.

The staff also determined that the existing requirements to shut down a plant if coolant radioiodine activity limits are exceeded for 800 hours in a 12-month period can be eliminated. The quality of nuclear fuel has been greatly improved over the past decade with the result that normal coolant radioiodine activity (i.e., in the absence of iodine spiking) is well below the limit. Appropriate actions would be initiated long before accumulating 800 hours above the radioiodine activity limit. In addition, 10 CFR 50.72(b)(1)(ii) requires the NRC to be immediately notified of fuel cladding failures that exceed expected values or that are caused by unexpected factors. Therefore, this TS limit is no longer considered necessary on the basis that proper fuel management by licensees and existing reporting requirements should preclude ever approaching the limit.

Licensees are expected to continue to monitor iodine activity in the primary coolant and take appropriate actions to maintain it at a reasonably low level (i.e., accumulated time with high radioiodine activity should not approach 800 hours in a 12-month period).

Guidance and model TS, on the reduced requirements for the actions to be taken when the plant is not in compliance with LCO 3.4.8, were issued by the staff in GL 85-19. The proposed changes submitted by TVA in its letter dated January 27, 1989 were compared to this guidance and the Westinghouse Model TS in GL 85-19. Sequoyah is a two unit Westinghouse Pressurized Water Reactor plant.

In its application, TVA stated that the fuel performance at Sequoyah is consistent with the industry experience on improved fuel performance discussed by the staff in GL 85-19 and is the basis for reducing the RCS radioiodine requirements in the TS. Therefore, GL 85-19 is applicable to Sequoyah.

The proposed changes to delete part of the Action statements for LCO 3.4.8 will have the remaining statements agree with the Westinghouse model TS in GL 85-19. Therefore, we conclude that the proposed changes are acceptable.

The proposed changes to add an additional requirement to TS Section 6.9, Annual Reports, is consistent with the paragraph in GL 85-19 for an annual report. Therefore, we conclude that these proposed changes are acceptable.

In its proposed changes to the Bases Section 3/4.4.8, Specific Activity, TVA would delete the following statements: (1) "operation with specific activity level exceeding 1.0 microcuries/gram dose equivalent I-131 but within the limits shown in Figure 3.4-1 must be restricted to no more than 800 hours per year..." and (2) "the reporting of cumulative operating time over 500 hours in any 6-month consecutive period with greater than 1.0 microcuries/gram dose equivalent I-131 will allow sufficient time for Commission evaluation of the circumstances prior to reaching the 800 hour limit." There is no guidance in GL 85-19 on Bases statements, but because the requirement on reporting when RCS I-131 exceeds 1.0 microcuries/gram for more than 500 hours in any 6-month consecutive period is being deleted, the second Bases statement above should be deleted. The staff will be informed of high activity by reports required by 10 CFR 50.72(b)(1)(ii).

For the first Bases statement above, GL 85-19 states that licensees are expected to monitor RCS radioiodine activity and take actions so that the accumulated time with activity above 1.0 microcuries/gram is less than 800 hours in a 12-month period. Therefore, deleting the first Bases statement conflicts with GL 85-19. In a phone call on May 30, 1989, this was discussed with TVA and TVA proposed the following sentence, to revise the first Bases statement: "Operation with specific activity exceeding 1.0 microcuries/gram dose equivalent I-131 but within the limits shown on Figure 3.4-1 should be limited to no more than 800 hours per year since the activity levels allowed by Figure 3.4-1 increase the 2-hour thyroid dose at the site boundary by a factor of up to 20 following a postulated steam generator tube rupture." We conclude that this sentence is consistent with GL 85-19 and is, therefore, acceptable.

This revision of the proposed Bases changes does not affect the staff's proposed determination of no significant hazards consideration published in the Federal Register Notice (54 FR 9934) on March 8, 1989. Because, in accordance with 10 CFR 50.36(a), the Bases are not part of the TS, this revision to the proposed Bases changes may be made without prior notice in the Federal Register.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. The amendments also relate to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement nor environmental assessment need to be prepared in connection with the issuance of these amendments.

4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (54 FR 9934) on March 8, 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: J. Donohew

Dated: June 19, 1989