April 16, 1990

Docket Nos. 50-327
and 50-328

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: FEDERAL REGISTER NOTIFICATION - TAC NOS. 76429 AND 76430, SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated April 5, 1990, the Tennessee Valley Authority requested an exigent review of proposed amendments to the Sequoyah Units 1 and 2 Technical Specifications, regarding revisions to the requirements on the operability of the emergency diesel generators. Enclosed is a copy of the individual notice published in the Federal Register on April 12, 1990 to publicly announce that the Nuclear Regulatory Commission is considering issuance of these amendments on an exigency basis.

If you have any questions concerning the enclosed FR notice, please contact Jack Donohew, Sequoyah Project Manager, at (301) 492-0703.

Sincerely,

Original signed by

Suzanne C. Black, Assistant Director
for Projects
TVA Projects Division
Office of Nuclear Reactor Regulation

Enclosure:
Federal Register Notice

cc w/enclosure:
See next page

~~9004230339~~ 3pp. Exact Copy.

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NAME	:JDonohew:as	:RPierson	:SBTack	:	:	:	:
DATE	:4/6/90	:4/6/90	:4/6/90	:	:	:	:

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Transmitting Individual Notices of Proposed Issuances (with/without Significant Hazards Consideration)

Docket File
NRC PDR
Local PDR
ADSP Reading
D. Crutchfield
T. Quay
B. D. Liaw
S. Black
R. Pierson
E. Marinos
B. Wilson
L. Watson
J. Brady
LA
J. Donohew
OGC
D. Hagan
ACRS (10)
GPA/PA
GPA/CA
SQN Rdg. File

cc:
Mr. Marvin Runyon, Chairman
Tennessee Valley Authority
ET 12A 7A
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Mr. C. H. Dean, Jr., Director
Tennessee Valley Authority
ET 12A 11A
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Mr. John B. Waters, Director
Tennessee Valley Authority
ET 12A 9A
400 West Summit Hill Drive
Knoxville, Tennessee 37902

Mr. W. F. Willis
Chief Operating Officer
ET 12B 16B
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Manager, Nuclear Licensing
and Regulatory Affairs
Tennessee Valley Authority
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Chattanooga, Tennessee 37402-2801

Mr. Joseph Bynum, Acting Site Director
Sequoyah Nuclear Plant
Tennessee Valley Authority
P. O. Box 2000
Soddy Daisy, Tennessee 37379

Mr. Mark J. Burzynski
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

TENNESSEE VALLEY AUTHORITY

SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO FACILITY OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of amendments to Facility Operating License Nos. DPR-77 and DPR-79, issued to the Tennessee Valley Authority (TVA), for operation of the Sequoyah Nuclear Plant, Units 1 and 2, located in Hamilton County, Tennessee.

The amendments in TVA's application dated April 5, 1990 would revise Action Statement "a" of Limiting Condition for Operation (LCO) 3.8.1.1, minimum alternating current electrical power sources for the site, of the Sequoyah Units 1 and 2 Technical Specifications (TSs). These changes would add a footnote to the action statement for when one train of emergency diesel generators (DGs) is inoperable to extend the allowable outage time for one train of DGs when the chemical cleaning of the DG fuel-oil storage tanks is being performed.

The proposed revision to the action statement is to allow sufficient time for the cleaning of these tanks which is required by Surveillance Requirement 4.8.1.1.2.f.1. The proposed revision would apply only to this SR and would extend the allowed outage time for a train of DGs from 72 hours in Action Statement "a" to 144 hours to clean the four tanks for one of the two DGs sets that constitute a train of DGs.

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A train of DGs is two DG sets each set having four underground storage tanks. The four DG sets have a total of 16 storage tanks. The 16 tanks are embedded inside the diesel generator building substructure. The building houses the four DG sets that comprise the two DG trains for both Sequoyah units.

Four of the 16 embedded DG tanks will be cleaned at a time which will require the DG set for those four tanks to be considered inoperable because the DG would not be able to receive fuel oil from its tank. There is no other reason that the DG would be considered inoperable and the other three DGs would be operable. The affected DG would be able to receive fuel oil from the tanks for the other DG of the same train, from the tanks for the DGs of the other train, from either of the two yard diesel oil storage tanks, or from tanker trucks brought onsite; but, by the TSs, this would not allow the affected DG to be considered operable. However, only one train of DGs would be affected by the cleaning of the DG tanks.

TVA evaluated the tasks required to clean the DG tanks for one DG set and provided the following information on the time expected to perform the work and return the DG set and train to operable status. TVA stated that the tasks to clean a set of four DG tanks include the following.

- Connect temporary lines and verify operation.
- Pump down embedded tanks and pull manways.
- Pump out sludge and fuel residual and evacuate tank atmosphere.
- Flush tanks with water and pump down.
- Clean tanks of residue and rust.

- Dry tanks.
- Wipe tanks with sodium hypochlorite solution.
- Quality control inspection of tanks
- Refill tanks with fuel and replace manways.
- Remove temporary connections and make up permanent connections.
- Perform surveillance tests of tanks to verify operability.

TVA has estimated that the planned duration, without allowance for contingencies, is approximately 100 hours for each set of four embedded tanks. TVA has added an additional 44 hours as a contingency allowance to resolve equipment problems, work in more severe environmental conditions than expected, and correct minor problems that may be found in a tank. Therefore, TVA has proposed 144 hours that a DG set may be inoperable to clean its associated tanks.

The total duration of 144 hours exceeds the present 72-hour allowable outage time for one DG set or one train of DGs by 72 hours. This process would have to be repeated for each diesel generator set. As a result, the present TS requirements require a two-unit shutdown to enter a Mode 5 outage for both units just to perform the chemical cleaning required by SR 4.8.1.1.2.f.1. TVA states that such a two-unit Mode 5 outage represents an unrealistic economic burden that was not considered when the TSs were first issued. Although Unit 1 is shutdown for refueling at this time, Unit 2 is at 100% power. If the non-affected DG train becomes inoperable for any reason, the TSs require the operating unit to shut down within eight hours.

TVA requested that this change be processed as an exigent change to support an expedited schedule to clean the embedded diesel generator fuel-oil storage tanks and replace the diesel fuel oil. TVA had previously planned to

pursue this TS change as a regularly scheduled action item after the Unit 1 Cycle 4 refueling outage.

The request by TVA for an exigent review by the staff of the proposed changes is based on the potential need to clean these tanks as soon as practical. TVA has a fuel-oil sampling and analysis program intended to detect fuel deterioration. Recently the results of diesel fuel-oil testing, while not out of compliance with TS acceptance criteria, identified an adverse trend with particulate levels in the fuel oil. TVA stated that the present particulate levels do not represent an operability concern but are indicative of fuel-oil deterioration. As a result, it has expedited the chemical cleaning of the tanks which have not previously been cleaned and the replacement of the fuel oil in the tanks. This activity is planned for all four DGs and would begin as soon as practical only after receipt of the approval of this TS change. The staff is aware of this potential problem and agrees with TVA that the DG tanks should be cleaned as soon as practical because of the importance of the DGs during a loss of offsite power. Therefore, the staff has concluded pursuant to 10 CFR 50.91(6) that exigent circumstances exist at Sequoyah in that the licensee and the Commission need to act quickly and that time does not permit the Commission to publish this notice and allow 30 days for prior public comments.

Before issuance of the proposed amendments, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

The Commission has made a proposed determination that the amendment request involves no significant hazards considerations. Under the Commission's

regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendments would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

In its application dated April 5, 1990, TVA provided the following conclusions on its determination that no significant hazards considerations exist for the proposed changes to the TSs:

> TVA has evaluated the proposed technical specification (TS) change and has determined that it does not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Operation of SQN in accordance with the proposed amendment will not:
>
> (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.
>
> The proposed change increases the allowable outage time for one train of onsite emergency power (two diesel generator sets) from 72 hours to 144 hours during the performance of chemical cleaning required by SR 4.8.1.1.2.f.1. A temporary fuel oil supply will be provided to the diesel generator set when its associated embedded fuel-oil tank is being cleaned. The diesel generator day tanks will be connected to the seven-day tank of the other diesel generator with the same train designation with temporary, but rugged, industrial hoses with threaded fittings. The relatively short duration of the temporary configuration (less than 144 hours), coupled with the infrequent performance of the chemical cleaning (approximately every 10 years), minimizes the probability that the affected diesel generator sets will be required for extended operation during the chemical cleaning. The compensatory measure for providing an additional onsite seven-day diesel generator fuel supply, coupled with the installed capability to fill the embedded tanks directly from tanker trucks, ensures that the full seven-day fuel capacity will be available for all reasonable scenarios involving extended diesel generator operation. During the entire chemical cleaning process the opposite train diesel generator sets will be fully operable.

(2) Create the possibility of a new or different kind of accident from any previously any previously analyzed.

The proposed change involves a temporary configuration for the diesel generator fuel-oil system. The diesel generator day tanks will be [connected] to the seven-day tank of the other diesel generator with temporary, but rugged, industrial hoses with threaded fittings. The temporary configuration keeps all temporary lines inside the diesel generator building. During this period, the fire doors to the affected diesel engine rooms will be breached. A continuous watch will be posted while the doors are breached to detect potential fires and fuel-line leaks. Fire watches are a standard compensatory measure utilized for transient fire loads and fire barrier breaches. Therefore the possibility of a new or different kind of accident is not created.

(3) Involve a significant reduction in a margin of safety

The proposed change involves an increase in the allowable outage time for two diesel generators that will be used at ten-year intervals to support chemical cleaning of the embedded storage tanks. That change is offset by compensatory measures (temporary fuel supply connections and additional onsite storage capacity) that are utilized during the cleaning process to ensure that the affected diesel generators remain functional. Additionally, the installed fuel-oil system has the capability to receive fuel directly from tanker trucks. In the event of extended diesel generator operation, additional fuel oil can be purchased and delivered to the site within the 3.5-day time allotted by the embedded storage tank capacity, since fuel oil is a readily available commodity. Furthermore, the timely cleaning and fuel replacement will ensure that the highest possible diesel generator reliability can be maintained.

The staff has reviewed TVA's determination that no significant hazards considerations exist. There is only one DG set and one DG train affected at a time, the cleaning would not start unless the other three DG sets are operable, the DG set affected would be able to receive oil from the DG tanks of the other DG set in the train and the temporary connection would be within the DG building which houses the four DG sets, the tanks for the DGs of the affected train would be able to receive oil from three independent sources, and a continuous watch will be posted while the fire doors are breached with the temporary connections to detect fires and fuel line leaks. Based on this, the staff agrees with TVA that no significant hazards considerations exist for the proposed amendments.

Accordingly, the Commission proposes to determine that the amendment request does not involve significant hazards considerations.

The Commission is seeking public comments on this proposed determination. Any comments received within 15 days after the date of publication of this notice will be considered in making any final determination. The Commission will not normally make a final determination unless it receives a request for a hearing.

Written comments may be submitted by mail to the Regulatory Publications Branch, Division of Freedom of Information and Publications Services, Office of Administration, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, and should cite the publication date and page number of this FEDERAL REGISTER notice. Written comments may also be delivered to Room P-223, Phillips Building, 7920 Norfolk Avenue, Bethesda, Maryland, from 7:30 a.m. to 4:15 p.m. Copies of written comments received may be examined at the NRC Public Document Room, the Gelman Building, 2120 L Street, NW, Washington, D.C. The filing of requests for hearing and petitions for leave to intervene is discussed below.

By May 12, 1990, TVA may file a request for a hearing with respect to issuance of the proposed amendments to the Sequoyah facility operating license and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for hearing and a petition for leave to intervene. Requests for a hearing and petitions for leave to intervene shall be filed in accordance with the Commission's "Rule of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. Interested persons should consult a current copy of 10 CFR 2.714 which is available at the Commission's Public Document Room, the Gelman Building,

Building, 2120 L Street, N.W., Washington, D.C. 20555 and at the Local Public Document Room located at the Chattanooga-Hamilton County Library, 1001 Broad Street, Chattanooga, Tennessee. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board, designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel, will rule on the request and/or petition; and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene shall set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the

petition to intervene which must include a list of the contentions which are sought to be litigated in the matter. Each contention must consist of a specific statement of the issue of law or fact to be raised or controverted. In addition, the petitioner shall provide a brief explanation of the bases of the contention and a concise statement of the alleged facts or expert opinion which support the contention and on which the petitioner intends to rely in proving the contention at the hearing. The petitioner must also provide references to those specific sources and documents of which the petitioner is aware and on which the petitioner intends to rely to establish those facts or expert opinion. Petitioner must provide sufficient information to show that a genuine dispute exists with the applicant on a material issue of law or fact. Contentions shall be limited to matters within the scope of the amendments under consideration. The contention must be one which, if proven, would entitle the petitioner to relief. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

If the amendments are issued before the expiration of 30-days, the Commission will make a final determination on the issue of no significant hazards consideration. If a hearing is requested, the final determination will serve to decide when the hearing is held.

If the final determination is that the amendments do not involve a significant hazards consideration, the Commission may issue the amendments and make them effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendments.

If the final determination is that the amendments do involve significant hazards considerations, any hearing held would take place before the issuance of any amendment.

Normally, the Commission will not issue the amendments until the expiration of the 15-day notice period. However, should circumstances change during the notice period, such that failure to act in a timely way would result, for example, in derating or shutdown of the facility, the Commission may issue the license amendments before the expiration of the 15-day notice period, provided that its final determination is that the amendments involve no significant hazards considerations. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish a notice of issuance in the FEDERAL REGISTER. The Commission expects that the need to take such an action will occur very infrequently.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, the Gelman Building, 2120 L Street, N.W., Washington, D.C., by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at 1-(800) 325-6000 (in Missouri 1-(800) 342-6700). The

Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to Suzanne C. Black, Assistant Director for Projects: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and to the General Counsel, Tennessee Valley Authority, 400 West Summit Hill Drive, E11 B33, Knoxville, Tennessee 37902.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board that the petition and/or request should be granted based upon a balancing of the factors specified in 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

For further details with respect to this action, see the TVA application for amendments dated April 5, 1990, which is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, N.W., Washington, D.C. 20555, and at the Local Public Document Room, the Chattanooga-Hamilton County Library, 1001 Broad Street, Chattanooga, Tennessee 37402.

Dated at Rockville, Maryland, this 6th day of April 1990.

FOR THE NUCLEAR REGULATORY COMMISSION

Suzanne Black

Suzanne C. Black, Assistant Director
for Projects
TVA Projects Division
Office of Nuclear Reactor Regulation