Docket Nos. 50-327
and 50-328

December 8, 1992

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford, Vice President
Nuclear Assurance, Licensing & Fuels
3B Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Dr. Medford:

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M84877 AND M84878) (TS 92-15)

The Commission has issued the enclosed Amendment No. 165 to Facility Operating License No. DPR-77 and Amendment No. 155 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 November 9, 1992.

The amendments provide an alternate method for satisfying the response time requirements of the engineered safety features actuation system (ESFAS) for the feedwater instrumentation channels when the feedwater line is isolated.

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

Sincerely,

Original signed by

David E. LaBarge, Senior Project Manager
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:
1. Amendment No. 165 to License No. DPR-77
2. Amendment No. 155 to License No. DPR-79
3. Safety Evaluation

cc w/enclosures:
See next page

OFC:	PDII-4/LA	PDII-4/PM	SPLB	OGC
NAME:	MSanders	DLaBarge:as	CMcCracken	CGrimes
DATE:	12/3/92	11/24/92	12/1/92	12/2/92

OFC:	OGC (Comments)	PDII-4/D
NAME:	E. Hollox	FHebdon
DATE:	12/14/92	12/8/92

comments incorporated 12/8/92

Sequoyah Nuclear Plant

Tennessee Valley Authority
ATTN: Dr. Mark O. Medford

cc:
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Tennessee Valley Authority
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Knoxville, Tennessee 37902

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Chattanooga, Tennessee 37402

Regional Administrator
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Atlanta, Georgia 30323

Mr. William E. Holland
Senior Resident Inspector
Sequoyah Nuclear Plant
U.S.N.R.C.
2600 Igou Ferry Road
Soddy Daisy, Tennessee 37379

AMENDMENT NO.165 FOR SEQUOYAH UNIT NO. 1 - DOCKET NO. 50-327 and
AMENDMENT NO.155 FOR SEQUOYAH UNIT NO. 2 - DOCKET NO. 50-328
DATED: December 8, 1992

Distribution

Docket File	
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Local PDR	
SQN Reading File	
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G. Hill	P1-130 (8)
Wanda Jones	MNBB-7103
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ACRS(10)	
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OC/LFMB	MNBB-9112
C. Grimes	11-E-22

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. 165
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 November 9, 1992, 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. 165 , 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, to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Frederick J. Hebdon, Director
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 8, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 165

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.

REMOVE	INSERT
3/4 3-33	3/4 3-33
3/4 3-33a	3/4 3-33a

TABLE 3.3-5 (Continued)

TABLE NOTATION

(1) Diesel generator starting and sequence loading delays included. Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps, SI and RHR pumps.

(2) Using air operated valve. The ESFAS instrumentation channel RESPONSE TIME requirement for specific feedwater air-operated valve(s) can also be met when the associated air-operated valve is either closed with air supply(s) isolated, isolated by a closed manual valve, or isolated by a closed feedwater isolation valve with power removed. When using one of these provisions for satisfying the air-operated valve response time, the closed or isolated condition described above will be verified at least once per 7 days.

(3) The following valves are exceptions to the response times shown in the table and will have the values listed in seconds for the initiating signals and function indicated:

Valves: FCV-26-240, -243
Response times:
2.d. $21^{(8)}/31^{(9)}$
3.d. $22^{(8)}$
4.d. $21^{(8)}/31^{(9)}$
5.d. $24^{(8)}/34^{(9)}$
6.d. $21^{(8)}/31^{(9)}$

Valves: FCV-61-96, -97, -110, -122, -191, -192, -193, -194
Response times:
2.d. $31^{(8)}$
3.d. $32^{(8)}$
4.d. $31^{(8)}$
5.d. $34^{(8)}$
6.d. $31^{(8)}$

Valve: FCV-70-143
Response times:
2.d. $61^{(8)}/71^{(9)}$
3.d. $62^{(8)}$
4.d. $61^{(8)}/71^{(9)}$
5.d. $64^{(8)}/74^{(9)}$
6.d. $61^{(8)}/71^{(9)}$

(4) On 2/3 any Steam Generator

(5) On 2/3 in 2/4 Steam Generator

(6) Radiation detectors for Containment Ventilation Isolation may be excluded from Response Time Testing.

TABLE 3.3-5 (Continued)

TABLE NOTATION

(7) Diesel generator starting and sequence loading delays not included. Offsite power available. Response time limit includes opening and closing of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps.

(8) Diesel generator starting and sequence loading delays not included. Response time limit includes operating time of valves.

(9) Diesel generator starting and sequence loading delays included. Response time limit includes operating time of valves.

(10) The response time for loss of voltage is measured from the time voltage is lost until the time full voltage is restored by the diesel. The response time for degraded voltage is measured from the time the load shedding signal is generated, either from the degraded voltage or the SI enable timer, to the time full voltage is restored by the diesel. The response time of the timers is covered by the requirements on their setpoints.

(11) The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 for the turbine-driven Auxiliary Feedwater Pump.

(12) The following valves are exceptions to the response times shown in the Table and will have the values listed in seconds for the initiating signals and the function indicated:

Valves: FCV-67-89, -90, -105, -106
Response times: 7.b, $75^{(8)}/85^{(9)}$

Valve: FCV-70-141
Response times: 7.b, $70^{(8)}/80^{(9)}$

(13) Containment purge valves only. Containment radiation monitor valves have a response time of 6.5 seconds or less.

(14) Does not include Trip Time Delays. Response times noted include the transmitters, Eagle-21 process protection cabinets, solid state protection cabinets, and actuation devices (up to and including pumps). This reflects the response times necessary for THERMAL POWER in excess of 50% RTP.

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. 155
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 November 9, 1992, 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. 155, 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, to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Frederick J. Hebdon

Frederick J. Hebdon, Director
Project Directorate II-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: December 8, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 155

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.

REMOVE	INSERT
3/4 3-33	3/4 3-33
3/4 3-33a	3/4 3-33a

TABLE 3.3-5 (Continued)

TABLE NOTATION

(1) Diesel generator starting and sequence loading delays included. Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps, SI and RHR pumps.

(2) Using air operated valve. The ESFAS instrumentation channel RESPONSE TIME requirement for specific feedwater air-operated valve(s) can also be met when the associated air-operated valve is either closed with air supply(s) isolated, isolated by a closed manual valve, or isolated by a closed feedwater isolation valve with power removed. When using one of these provisions for satisfying the air-operated valve response time, the closed or isolated condition described above will be verified at least once per 7 days.

(3) The following valves are exceptions to the response times shown in the table and will have the values listed in seconds for the initiating signals and function indicated:

Valves: FCV-26-240, -243
Response times:
2.d. $21^{(8)}/31^{(9)}$
3.d. $22^{(8)}$
4.d. $21^{(8)}/31^{(9)}$
5.d. $24^{(8)}/34^{(9)}$
6.d. $21^{(8)}/31^{(9)}$

Valves: FCV61-96, -97, -110, -122, -191, -192, -193, -194
Response times

2.d. $31^{(8)}$
3.d. $32^{(8)}$
4.d. $31^{(8)}$
5.d. $34^{(8)}$
6.d. $31^{(8)}$

Valve: FCV-70-143
Response times:
2.d. $61^{(8)}/71^{(9)}$
3.d. $62^{(8)}$
4.d. $61^{(8)}/71^{(9)}$
5.d. $64^{(8)}/74^{(9)}$
6.d. $61^{(8)}/71^{(9)}$

(4) On 2/3 any Steam Generator

(5) On 2/3 in 2/4 Steam Generator

(6) Radiation detectors for Containment Ventilation Isolation may be excluded from Response Time Testing.

TABLE 3.3-5 (Continued)

TABLE NOTATION

(7) Diesel generator starting and sequence loading delays not included. Offsite power available. Response time limit includes opening and closing of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps.

(8) Diesel generator starting and sequence loading delays not included. Response time limit includes operating time of valves.

(9) Diesel generator starting and sequence loading delays included. Response time limit includes operating time of valves.

(10) The response time for loss of voltage is measured from the time voltage is lost until the time full voltage is restored by the diesel. The response time for degraded voltage is measured from the time the load shedding signal is generated, either from the degraded voltage or the SI enable timer, to the time full voltage is restored by the diesel. The response time of the timers is covered by the requirements on their setpoints.

(11) The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 for the turbine-driven Auxiliary Feedwater Pump.

(12) The following valves are exceptions to the response times shown in the table and will have the values listed in seconds for the initiating signals and the function indicated:

Valves: FCV-67-89, -90, -105, -106

Response times: 7.b, $75^{(8)}/85^{(9)}$

Valve: FCV-70-141
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(13) Containment purge valves only. Containment radiation monitor valves have a response time of 6.5 seconds or less.

(14) Does not include Trip Time Delays. Response times noted include the transmitters, Eagle-21 process protection cabinets, solid state protection cabinets, and actuation devices (up to and including pumps). This reflects the response times necessary for THERMAL POWER in excess of 50% RTP.

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

ENCLOSURE 3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. DPR-77

AND AMENDMENT NO. 155 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 application dated November 9, 1992, the Tennessee Valley Authority (the licensee) proposed amendments to the Technical Specifications (TS) for Sequoyah Nuclear Plant (SQN) Units 1 and 2. The requested changes would provide an alternate method for satisfying the response time requirements of the engineered safety features actuation system (ESFAS) for the feedwater instrumentation channels when the feedwater line is isolated. This would be accomplished by adding the following to TS Table 3.3-5, Notation 2:

> "The ESFAS instrumentation channel RESPONSE TIME requirement for specific feedwater air operated-valve(s) can also be met when the associated air-operated valve is either closed with air supply(s) isolated, isolated by a closed manual valve, or isolated by a closed feedwater isolation valve with power removed. When using one of these provisions for satisfying the air-operated valve response time, the closed or isolated condition described above will be verified at least once per 7 days."

The TS for SQN requires that the response time for feedwater line isolation be maintained within the limits assumed in the accident analysis. As a result of the need to perform maintenance on the air-operated feedwater valves, it was discovered that a literal interpretation of the TS provides no alternative means to meet the response time requirements when the feedwater line is isolated (i.e., the response time requirements are in effect even if the valve is already in its isolation position). Therefore, the requirement would remain in effect for an inoperable feedwater isolation valve, even if the safety function was being provided by other means. Therefore, the licensee submitted the TS change to address requirements that would allow maintenance of the feedwater valves while, at the same time, maintaining the safety function of the feedwater isolation system.

2.0 EVALUATION

The engineered safety features portion of the feedwater system includes the auxiliary feedwater system, feedwater check valves, feedwater motor operated gate valves, feedwater air-operated flow control valves, feedwater valve air-operated bypass valves, manual feedwater isolation valves, and associated ESFAS instrumentation. The ESFAS instrumentation is designed to limit the core energy released as a result of a steamline break, to limit the magnitude of the reactor coolant system cooldown, and to prevent or mitigate the effect of excessive cooldown, by shutting the feedwater air and motor-operated valves when a feedwater isolation signal is generated.

According to the TS Bases, operability of the ESFAS instrumentation systems ensures that (1) the associated action will be initiated when the parameter monitored reaches its setpoint, (2) the specified coincidence logic is maintained, (3) sufficient redundancy is maintained to permit a channel to be out of service for testing or maintenance, and (4) sufficient system functional capability is available from diverse parameters. Since the instrumentation itself would not be affected by the proposed TS change, these concerns would not be affected.

The feedwater isolation signal is generated by the reactor protection system and causes all of the feedwater regulator valves, bypass valves, and motor-operated isolation valves to shut upon receipt of any of the following isolation signals:

a. High-high steam generator water level in any steam generator,

b. Safety injection signal (containment pressure high, pressurizer pressure low, steam line pressure low), or

c. Reactor trip coincident with low reactor coolant Tavg

Upon receipt of an isolation signal, the feedwater regulating valves close in a nominal 6.5 seconds, and the motor-operated isolation valves close within 7.5 seconds. The air-operated feedwater regulating valves are the primary mechanism for feedwater isolation assumed in the loss of coolant accident (LOCA) and non-LOCA analysis. Closure of the motor-operated feedwater isolation valves is considered a backup mechanism in the analysis, in conjunction with tripping of the feedwater pumps. The proposed TS change will not affect the ability of the trip system to generate a trip signal.

The feedwater isolation response time specified in the TS, which includes the valve closure time and the inherent electronic time delays for sensor and circuitry actuation, is required to be less than or equal to 8 seconds for the safety injection signals trip, and less than or equal to 11 seconds for the high-high steam generator level signal trip. The assumptions used to determine the appropriate response time for accident analysis purposes are the following:

a. SQN is an ice condenser plant that by design reduces peak pressure in the containment, both in magnitude and duration;

b. The unisolatable volume of the feedwater system between the regulating valves and the steam generators is no more than 104 cubic feet, which is less than the maximum volume of 150 cubic feet recommended by Westinghouse Electric Corporation; and

c. The main feedwater pumps are tripped on a feedwater isolation signal.

These considerations are unaffected by the proposed TS change. However, inclusion of the valve closure time in the response time limits specified in the TS, with no alternative provisions, has resulted in the inability to meet the specification when a feedwater regulator valve is inoperable.

Implementation of the proposed change would allow the isolation of a feedwater flow path to serve as the alternative and, thereby, satisfy the ESFAS instrumentation response time requirement for feedwater valve closure. With the flow path isolated, the safety function provided by the feedwater valves and the isolation signal have already been achieved, since the response time for feedwater line isolation is reduced to zero. However, if an isolation signal is generated by the instrumentation, it will continue to shut the remaining feedwater valves.

The licensee has proposed three methods that would, by isolating the feedwater flow path, satisfy the TS requirements for a specific feedwater ESFAS instrument channel. The first alternative, isolation of the air supply(s), ensures that the referenced valve is deactivated to prevent inadvertent operation, since they fail closed by spring pressure on loss of air. For the second alternative, use of a closed manual isolation valve, the same isolation of feedwater flow is provided that is assumed by closure of the air-operated feedwater valve with no time delay. For the third alternative, closure of the motor-operated feedwater valve with power removed, feedwater flow is again isolated from the main and bypass air-operated valves. In addition, removal of power prevents inadvertent operation of the valve.

The licensee also proposed verification every 7 days that the isolated condition is in effect to ensure that no changes are made to the status of the isolation.

Staff review of the proposed TS change has determined that the safety requirements of the ESFAS instrument channels would continue to be satisfied by implementing any of the alternatives allowed by the proposed change, since the safety function would be in effect (the feedwater line would be isolated) when the response time requirement could not be satisfied. In addition, the verification interval is consistent with similar system status checks and the Standard Technical Specifications. Therefore, the staff has determined that the proposed change is acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Tennessee State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 EXIGENT CIRCUMSTANCES

The staff has reviewed the licensee's proposed amendments and finds (1) that exigent circumstances exist, as provided for in 10 CFR 50.91(a)(6), in that the licensee and the Commission must act quickly and that time does not permit the Commission to publish a Federal Register notice allowing 30 days for prior public comment, and (2) that the licensee has not failed to use its best efforts to make a timely application and avoid creating the exigent circumstance. The Commission noticed the licensee's November 9, 1992 application for amendments in the Federal Register on November 20, 1992 (57 FR 54865), at which time the Commission made a proposed finding that the amendments involved no significant hazards condition and there has been no public comment in response to the notice.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 provide that the Commission may make a final determination that a license amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not:

a. Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed TS change fully maintains the feedwater isolation (FWI) functions assumed in the accident analysis. In addition, no component functions will be affected by utilizing the alternate methods to ensure completion of the FWI function for accident mitigation. Since maintaining the conditions to provide FWI is not postulated to create an accident, there is no increase in the probability of an accident. By maintaining isolation of the feedwater flow path when the response time for automatic actuation of the air-operated FWI valve is considered inoperable, all safety functions assumed in the accident analysis for FWI are met to mitigate accident conditions. Therefore, there is no increase in the consequences of an accident because the safety functions for accident mitigation are maintained by the alternate isolation methods, which are more conservative than the normal time-delayed valve actuation.

b. Create the possibility of a new or different kind of accident from any previously analyzed.

The isolation of feedwater flow is not considered the source of an accident although inadvertent isolation may initiate automatic unit shutdown that is an analyzed event. This change will not alter any plant design or operating parameters such that conditions could be created that would create new accident potentials. The isolation methods are the same as or equivalent to the closing of the air-operated valves and will not create any additional safety concern or plant operating impact.

c. Involve a significant reduction in a margin of safety.

This change provides alternate FWI methods that are more conservative than the delayed isolation assumed in the accident analysis. By placing the flow path in an isolated condition, the safety function is already achieved without the need for the valve actuation and the associated response time. Therefore, the use of these alternate FWI methods to satisfy TS response time requirements will actually result in an increase in the margin of safety when compared with normal plant operation.

Based on the above, the Commission has made a final determination that the proposed amendments involve no significant hazards consideration.

6.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC 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 the amendments involve no significant hazards consideration, and there has been no public comment on such finding (57 FR 54865). Also, the staff has made a final no significant hazards consideration determination. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

7.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: D. LaBarge

Date: December 8, 1992