Mr. Oliver D. Kingsle Jr. President, TVA Nucle\_and Chief Nuclear Officer Tennessee Valley Authority 6A Lookout Place 1101 Market Street Chattanooga, TN 37402-2801

August 12, 1997

#### ISSUANCE OF LICENSE AMENDMENTS FOR THE SEQUOYAH NUCLEAR PLANT, SUBJECT: UNITS 1 AND 2 (TAC NOS. M96996 AND M96997) (TS 96-04)

Dear Mr. Kingslev:

The Commission has issued the enclosed Amendment No. 227 to Facility Operating License No. DPR-77 and Amendment No.218 to the Facility Operating License No. DPR-79 for the Sequoyah Nuclear Plant, Units 1 and 2, respectively. The amendments consist of changes to the Technical Specifications (TS) and elimination of a license condition in response to your application dated September 26, 1996, as supplemented on August 12, 1997.

The amendments revise TS Section 3/4.3.3 (Monitoring Instrumentation), TS Section 3/4.7.11 (Fire Detection Systems), TS Section 3/4.7.12 (Fire Barrier Penetrations), TS Section 6.2.2 (Facility Staff), and Index pages V, IX, and XIV to relocate the fire protection program elements from the TS and incorporate, by reference, the NRC-approved Fire Protection Program into the Updated Safety Analysis Report. In addition, the amendments revise the Operating Licenses to include the NRC's standard fire protection license condition (License Condition 2.C(16) for Unit 1, 2.C(13) for Unit 2). These changes are made in accordance with the guidance provided in Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," and GL-88-12, "Removal of Fire Protection Requirements from Technical Specifications.'

A copy of our related Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's biweekly Federal Register notice.

> Sincerely. Original signed by Ronald W. Hernan, Senior Project Manager Project Directorate II-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

## Docket Nos. 50-327 and 50-328

# DISTRIBUTION W/ENCLOSURE

Enclosures:	1.	Amendment No. 227 to	
		License No. DPR-77	
	0	August Na 010 to	

- Amendment No. 218 to 2. License No. DPR-79
- 3. Safety Evaluation

Docket Files SON r/f GHill (4) ACRS THarris (TLH3 SE) MLesser. RII

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Mr. Oliver D. Kingsley, Jr. Tennessee Valley Authority

## CC:

Mr. O. J. Zeringue, Sr. Vice President Nuclear Operations Tennessee Valley Authority 6A Lookout Place 1101 Market Street Chattanooga, TN 37402-2801

Mr. Jack A. Bailey, Vice President Engineering & Technical Services Tennessee Valley Authority 6A Lookout Place 1101 Market Street Chattanooga, TN 37402-2801

Mr. Masoud Bajestani Site Vice President Sequoyah Nuclear Plant Tennessee Valley Authority P.O. Box 2000 Soddy Daisy, TN 37379

General Counsel Tennessee Valley Authority ET 10H 400 West Summit Hill Drive Knoxville, TN 37902

Mr. Raul R. Baron, General Manager Nuclear Assurance Tennessee Valley Authority 4J Blue Ridge 1101 Market Street Chattanooga, TN 37402-2801

Mr. Mark J. Burzynski, Manager Nuclear Licensing Tennessee Valley Authority 4J Blue Ridge 1101 Market Street Chattanooga, TN 37402-2801

والمجابة لاحتج وتتزري تر

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# SEQUOYAH NUCLEAR PLANT

Mr. Pedro Salas, Manager Licensing and Industry Affairs Sequoyah Nuclear Plant Tennessee Valley Authority P.O. Box 2000 Soddy Daisy, TN 37379

Mr. J. T. Herron, Plant Manager Sequoyah Nuclear Plant Tennessee Valley Authority P.O. Box 2000 Soddy Daisy, TN 37379

Regional Administrator U.S. Nuclear Regulatory Commission Region II 61 Forsyth Street, SW., Suite 23T85 Atlanta, GA 30303-3415

Mr. Melvin C. Shannon Senior Resident Inspector Sequoyah Nuclear Plant U.S. Nuclear Regulatory Commission 2600 Igou Ferry Road Soddy Daisy, TN 37379

Mr. Michael H. Mobley, Director Division of Radiological Health 3rd Floor, L and C Annex 401 Church Street Nashville, TN 37243-1532

County Executive Hamilton County Courthouse Chattanooga, TN 37402



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

# TENNESSEE VALLEY AUTHORITY

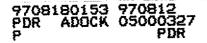
# DOCKET NO. 50-327

# SEQUOYAH NUCLEAR PLANT. UNIT 1

# AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 227 License No. DPR-77

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - Α. The application for amendment by Tennessee Valley Authority (the licensee) dated September 26, 1996, as supplemented on August 12. 1997, 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:
  - Β. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission:
  - С. 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
  - The issuance of this amendment is in accordance with 10 CFR Part 51 Ε. of the Commission's regulations and all applicable requirements have been satisfied.



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

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 227, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

Also, the license is amended by replacing Paragraph 2.C(16) on page 6 of Facility Operating License DPR-77 with the following:

(16) <u>Fire Protection</u>

TVA shall implement and maintain in effect all provisions of the approved fire protection program referenced in Sequoyah Nuclear Plant's Final Safety Analysis Report and as approved in NRC Safety Evaluation Reports contained in NUREG-0011, Supplements 1, 2, and 5, NUREG-1232, Volume 2, NRC letters dated May 29 and October 6, 1986, and the Safety Evaluation issued on August 12, 1997, for License Amendment No. 227, subject to the following provision:

TVA may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3. This license amendment is effective as of its date of issuance, to be implemented no later than 45 days after its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Frederick Frederick J. Hebdon, Director

Frederick J. HebMon, Director Project Directorate II-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: 1. Changes to the Technical Specifications 2. Page 6 of license\*

1

Date of Issuance: August 12, 1997

- 2 -

# ATTACHMENT TO LICENSE AMENDMENT NO. 227

# 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	<u>INSERT</u>
V IX XIV 3/4 3-58 3/4 3-59 through 3/4 3-69 3/4 7-31 3/4 7-32 3/4 7-33	V IX XIV 3/4 3-58 3/4 3-59 3/4 7-31 
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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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3/4.3.3	MONITORING INSTRUMENTATION
	RADIATION MONITORING INSTRUMENTATION
	MOVABLE INCORE DETECTORS
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	METEOROLOGICAL INSTRUMENTATION
	REMOTE SHUTDOWN INSTRUMENTATION
	CHLORINE DETECTION SYSTEMS (DELETED)
	ACCIDENT MONITORING INSTRUMENTATION
	FIRE DETECTION INSTRUMENTATION (DELETED)
•	DELETED
	EXPLOSIVE GAS MONITORING INSTRUMENTATION

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R152

SEQUOYAH - UNIT 1

Amendment No. 62, 138, 148,227

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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/4.9.8	

XIV

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Amendment No. 157, 204,227

# INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 This Specification is deleted.

SEQUOYAH - UNIT 1

3/4 3-58

!

Amendment No. 36227

TABLE 3.3-11

#### FIRE DETECTION INSTRUMENTS

This Table is deleted. (Pages 3/4 3-59 through 3/4 3-69 deleted)

3/4.7.11 FIRE SUPPRESSION SYSTEMS

FIRE SUPPRESSION WATER SYSTEM

#### LIMITING CONDITION FOR OPERATION

3.7.11.1 This Specification is deleted.

# Pages 3/4 7-31 and 3/4 7-32 are deleted.

3/4 7-31

!

Amendment No. 13, 36, 66, 186, 227

SPRAY AND/OR SPRINKLER SYSTEMS

#### LIMITING CONDITION FOR OPERATION

3.7.11.2 This Specification is deleted.

Pages 3/4 7-33 and 3/4 7-34 are deleted.

SEQUOYAH - UNIT 1

3/4 7-33

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Amendment No. 12, 36,227

# CO, SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.11.3 This Specification is deleted.

Pages 3/4 7-35 and 3/4 7-36 are deleted.

# SEQUOYAH - UNIT 1

3/4 7-35

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Amendment No. 12, 36, 96,227

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.11.4 This Specification is deleted.

SEQUOYAH - UNIT 1

3/4 7-37

!

Amendment No. 36, 114, 143,227

i

## TABLE 3.7-5

#### FIRE HOSE STATIONS

This Table is deleted (Pages 3/4 7-38 through 3/4 7-40 are deleted)

3/4 7-38

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Amendment No. 13,227

# 3/4.7.12 FIRE BARRIER PENETRATIONS

## LIMITING CONDITION FOR OPERATION

3.7.12 This Specification is deleted.

SEQUOYAH - UNIT 1

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# Amendment No. 36,227

#### INSTRUMENTATION

#### BASES

3/4.3.3.8 FIRE DETECTION INSTRUMENTATION

This Specification is deleted.

3/4.3.3.9

This Specification is deleted.

#### 3/4.3.3.10 EXPLOSIVE GAS MONITORING INSTRUMENTATION

This instrumentation includes provisions for monitoring the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPER-ABILITY and use of this instrumentation is consistent with the requirements for monitoring potentially explosive gas mixtures. R152

SEQUOYAH - UNIT 1

B 3/4 3-4

Amendment No. 43, 148, 149,227 |R153

#### BASES

#### SNUBBERS (Continued)

location, etc.), and the recommendations of Regulatory Guide 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

#### 3/4.7.10 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism (i.e., sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

#### 3/4.7.11 FIRE SUPPRESSION SYSTEMS

This Specification is deleted.

BR-3

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BASES

# 3/4.7.12 FIRE BARRIER PENETRATIONS

This Specification is deleted.

# SEQUOYAH - UNIT 1

1

# Amendment No. 39, 227

#### ADMINISTRATIVE CONTROLS \_

	A Radiological Control technician" shall be onsite when fuel is in the reactor.	R62
d.	All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.	FP
е.	Deleted	1
f.	The Operations Superintendent shall hold a Senior Reactor Operator license.	R160
g.	Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (i.e., senior reactor operators, reactor operators, assistant unit operators, Radiological Control, and key maintenance personnel).	
	Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:	
	<ol> <li>An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.</li> <li>An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour</li> </ol>	
	<ul> <li>period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.</li> <li>3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.</li> <li>4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.</li> </ul>	R156
lant Man procedure	tion from the above guidelines shall be authorized in advance by the ager or his designee, in accordance with approved administrative s, or by higher levels of management, in accordance with established s and with documentation of the basis for granting the deviation.	R182
shall be excessive	shall be included in the procedures such that individual overtime reviewed monthly by the Plant Manager or his designee to assure that hours have not been assigned. Routine deviation from the above s is not authorized.	
exceed 2	plogical Control technician may be offsite for a period of time not to hours in order to accommodate unexpected absence provided immediate taken to fill the required positions.	
exceed 2	hours in order to accommodate unexpected absence provided immediate	

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74, 152, 156, 178, 227

(c) By no later than June 30, 1982, all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactos" (DOR Guidelines); or, NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to the Order for Modification of Licence DPR-77 dated November 6, 1980.

# (13) Loss of Non-Class IE Instrumentation and Control Room System Bus During Operation (Section 7.10)

Prior to exceeding five percent power, TVA must complete revisions to plant emergency procedures to the satisfaction of the NRC.

# (14) Engineering Safety Feature (ESF) Reset Controls (Section 7.11)

In conformance with IE Bulletin 80-06, TVA shall test the system to identify any further areas of concern, and TVA shall review the control schemes to determine that they are the best in terms of equipment control and plant safety. The results of these test and review efforts shall be provided to the NRC in accordance with the bulletin.

# (15) <u>Diesel-Generator Reliability (Section 8.3.1)</u>

Prior to operation following the first refueling, TVA shall implement the following design and procedure modifications as outlined in Section 8.3.1 of SER Supplement No. 2. These include: (a) Moisture in Air Starting System; (b) Turbocharger Gear Drive Problem; and (c) Personnel Training.

## (16) <u>Fire Protection</u>

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TVA shall implement and maintain in effect all provisions of the approved fire protection program referenced in Sequoyah Nuclear Plant's Final Safety Analysis Report and as approved in NRC Safety Evaluation Reports contained in NUREG-0011, Supplements 1, 2, and 5, NUREG-1232, Volume 2, NRC letters dated May 29 and October 6, 1986, and the Safety Evaluation issued on August 12, 1997, for License Amendment No. 227, subject to the following provision:

TVA may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

Amendment No. 9, 227



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

# TENNESSEE VALLEY AUTHORITY

# DOCKET NO. 50-328

# SEQUOYAH NUCLEAR PLANT, UNIT 2

# AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 218 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 September 26, 1996, as supplemented on August 12, 1997, 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.

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

- 2 -

(2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 218, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

Also, the license is amended by replacing Paragraph 2.C(13) on page 6 of Facility Operating License DPR-79 with the following:

(13) Fire Protection

TVA shall implement and maintain in effect all provisions of the approved fire protection program referenced in Sequoyah Nuclear Plant's Final Safety Analysis Report and as approved in NRC Safety Evaluation Reports contained in NUREG-0011, Supplements 1, 2, and 5, NUREG-1232, Volume 2, NRC letters dated May 29 and October 6, 1986, and the Safety Evaluation issued on August 12, 1997, for License Amendment No. 218, subject to the following provision:

TVA may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3. This license amendment is effective as of its date of issuance, to be implemented no later than 45 days after its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Frederick J. Hebdon, Director Project Directorate II-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Attachment: 1. Changes to the Technical Specifications 2. Page 6 of license\*

1

Date of Issuance: August 12, 1997

# ATTACHMENT TO LICENSE AMENDMENT NO. 218

# 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	<u>INSERT</u>
V IX XIV 3/4 3-59 3/4 3-60 through 3/4 3-67a 3/4 7-43 3/4 7-44 3/4 7-45 3/4 7-46	V IX XIV 3/4 3-59 3/4 3-60 3/4 7-43 3/4 7-45
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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

## SECTION

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3/4.2.2	HEAT FLUX HOT CHANNEL FACTOR-FQ(Z)
3/4.2.3	NUCLEAR ENTHALPY HOT CHANNEL FACTOR
3/4.2.4	QUADRANT POWER TILT RATIO
3/4 2.5	DNB PARAMETERS

# 3/4.3 INSTRUMENTATION

3/4.3.1	REACTOR TRIP SYSTEM INSTRUMENTATION
3/4.3.2	ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION 3/4 3-14
3/4.3.3	MONITORING INSTRUMENTATION
	RADIATION MONITORING INSTRUMENTATION
	MOVABLE INCORE DETECTORS
	SEISMIC INSTRUMENTATION
	METEOROLOGICAL INSTRUMENTATION
	REMOTE SHUTDOWN INSTRUMENTATION
	CHLORINE DETECTION SYSTEMS (DELETED)
	ACCIDENT MONITORING INSTRUMENTATION
	FIRE DETECTION INSTRUMENTATION (DELETED)
•	DELETED
	EXPLOSIVE GAS MONITORING INSTRUMENTATION

SEQUOYAH - UNIT 2

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Amendment No. 54, 130, 134,218

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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3/4.7.8	AUXILIARY BUILDING GAS TREATMENT SYSTEM
3/4.7.9	SNUBBERS
3/4.7.10	SEALED SOURCE CONTAMINATION
3/4.7.11	FIRE SUPPRESSION SYSTEMS (DELETED)
3/4.7.12	FIRE BARRIER PENETRATIONS (DELETED)
3/4.8 ELEC	TRICAL POWER SYSTEMS
3/4.8.1	A.C. SOURCES
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	Shutdown
3/4.8.2	ONSITE POWER DISTRIBUTION SYSTEMS
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	A.C. Distribution - Shutdown
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SEQUOYAH - UNIT 2

IX

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Amendment No.218

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3/4.9.9	CONTAINMENT VENTILATION SYSTEM

SEQUOYAH - UNIT 2

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Amendment No. 194, 218

# FIRE DETECTION INSTRUM TATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 This Specification is deleted.

# SEQUOYAH - UNIT 2

3/4 3-59

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# Amendment No. 28,218

# TABLE 3.3-11 FIRE DETECTION INSTRUMENTS

This Table is deleted. (Pages 3/4 3-60 through 3/4 3-67a)

SEQUOYAH - UNIT 2

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3/4 3-60

Amendment No. 32, 86, 137, 173, 218

3/4.7.11 FIRE SUPPRESSION SYSTEMS

FIRE SUPPRESSION WATER SYSTEM

#### LIMITING CONDITION FOR OPERATION

3.7.11.1 This Specification is deleted.

# Pages 3/4 7-43 and 3/4 7-44 are deleted.

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Amendment No. 4, 28, 58, 178,218

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.11.2 This Specification is deleted.

Pages 3/4 7-45 and 3/4 7-46 are deleted.

3/4 7-45

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Amendment No. 28, 178,218

# CO, SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.11.3 This Specification is deleted.

SEQUOYAH - UNIT 2

3/4 7-47

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Amendment No. 28, 85,218

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.11.4 This Specification is deleted.

SEQUOYAH - UNIT 2

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# Amendment No. 32,218

# FIRE HOSE STATIONS

This Table is deleted (Pages 3/4 7-49 through 3/4 7-51)

SEQUOYAH - UNIT 2

3/4 7-49

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Amendment No. 104, 124,218

# 3/4.7.12 FIRE BARRIER PENETRATIONS

#### LIMITING CONDITION FOR OPERATION

3.7.12 This Specification is deleted.

SEQUOYAH - UNIT 2

3/4 7-52

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# Amendment No. 28,218

#### INSTRUMENTATION

#### BASES

#### 3/4.3.3.8 FIRE DETECTION INSTRUMENTATION

This Specification is deleted.

3/4.3.3.9

This Specification is deleted.

# 3/4.3.3.10 EXPLOSIVE GAS MONITORING INSTRUMENTATION

This instrumentation includes provisions for monitoring the concentrations of potentially explosive gas mixtures in the waste gas holdup system. The OPERA-BILITY and use of this instrumentation is consistent with the requirements for monitoring potentially explosive gas mixtures.

R134

#### SEQUOYAH - UNIT 2

B 3/4 3-4

Amendment Nos. 35, 46, 134, 218

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# BASES

# 3/4.7.11 FIRE SUPPRESSION SYSTEMS

This Specification is deleted.

SEQUOYAH - UNIT 2

B 3/4 7-7

Amendment No.218

# BASES

# 3/4.7.12 FIRE BARRIER PENETRATIONS

This Specification is deleted.

SEQUOYAH - UNIT 2

B 3/4 7-8

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Amendment No. 218

#### ADMINISTRATIVE CONTROLS

license.

- c. A Radiological Control technician<sup>#</sup> shall be onsite when fuel is in the reactor.
  d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
  e. DELETED
  f. The Operations Superintendent shall hold a Senior Reactor Operator [R145]
  - g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (i.e., senior reactor operators, reactor operators, assistant unit operators, Radiological Control, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

- 1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- 2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
- 3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
- 4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above quidelines is not authorized.

#The Radiological Control technician may be offsite for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

SEQUOYAH - UNIT 2

Amendment Nos. 50, 66, 142, 145, 169, 218 R169

R142

R142

## (13) <u>Fire Protection</u>

TVA shall implement and maintain in effect all provisions of the approved fire protection program referenced in Sequoyah Nuclear Plant's Final Safety Analysis Report and as approved in NRC Safety Evaluation Reports contained in NUREG-0011, Supplements 1, 2, and 5, NUREG-1232, Volume 2, NRC letters dated May 29 and October 6, 1986, and the Safety Evaluation issued on August 12, 1997, for License Amendment No. 218, subject to the following provision:

TVA may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

## (14) <u>Compliance With Regulatory Guide 1.97</u>

TVA shall implement modifications necessary to comply with Revision 2 of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," dated December 1980 by startup from the Unit 2 Cycle 4 refueling outage.

## (15) <u>Corrosion of Carbon Steel Piping</u>

TVA shall carry out a surveillance program on corrosion of carbon steel piping in accordance with TVA document SQRD-50-328/81-10 dated August 25, 1981, and procedures for implementation are to be submitted for NRC concurrence by October 15, 1981.

## (16) <u>NUREG-0737 Conditions (Section 22.2)</u>

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Each of the following conditions shall also be performed to the satisfaction of the NRC:

## a. <u>Shift Technical Advisor (Section 22.2, I.A.1.1)</u>

TVA shall provide a fully-trained on-shift technical advisor to the shift supervisor.

# b. Independent Safety Engineering Group (Section 22.2, I.B.1.2)

TVA shall have an onsite Independent Safety Engineering Group.



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 227 TO FACILITY OPERATING LICENSE NO. DPR-77 AND AMENDMENT NO. 218 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

Section 50.48, "Fire protection," Part 50, Title 10 of the Code of Federal Regulations (10 CFR Part 50) requires that each operating nuclear power plant have a fire protection plan that satisfies General Design Criterion (GDC) 3, "Fire protection," of Appendix A, 10 CFR Part 50. The fire protection plan must describe the overall fire protection program for the facility, outline the plans for fire protection, fire detection, and fire suppression capability, and limitations of fire damage. The program must also describe specific features necessary to implement the program, such as administrative controls and personnel requirements for fire prevention and manual fire suppression activities, automatic and manually operated fire detection and suppression systems, and the means to limit fire damage to structures, systems, or components important to safety so that the capability to safely shut down the plant is ensured. The U.S. Nuclear Regulatory Commission (NRC) staff approved the Sequoyah Nuclear Plant (SQN) fire protection program in Safety Evaluation Reports contained in NUREG-0011, Supplements 1, 2, and 5. NUREG-1232, Volume 2, and NRC letters dated May 29 and October 6, 1986.

In a submittal dated September 26, 1996, as supplemented on August 12, 1997. the Tennessee Valley Authority (TVA), the licensee for SQN, Units 1 and 2, proposed to change the SQN Technical Specifications (TS) related to fire protection and revise the fire protection license condition for each unit. The proposed amendments would implement the guidance provided in Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications." Specifically, the licensee has incorporated the NRC-approved fire protection program and major commitments, including the fire hazard analysis, into the Updated Final Safety Analysis Report (UFSAR) by reference to the Fire Protection Report (FPR), which was issued on August 30, 1996. Updates to the FPR will be made, as appropriate, in a manner similar to UFSAR updates. The proposed amendments would remove the fire protection program details from the TS and would revise the operating licenses to include the NRC's standard fire protection license condition. Specifically, the amendments would revise TS Sections 3/4.3.3 (Monitoring Instrumentation), 3/4.7.11 (Fire Detection Systems), 3/4.7.12 (Fire Barrier Penetrations), 6.2.2 (Facility Staff), and Index pages V, IX, and XIV. In addition, the amendments

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would revise the Operating Licenses to include the NRC's standard fire protection license condition (License Condition 2.C(16) for Unit 1, License Condition 2.C(13) for Unit 2).

GLs 86-10 and 88-12 referred to removing fire protection requirements from the TS. License amendments that relocate the fire protection requirements to the UFSAR in accordance with GLs 86-10 and 88-12 do not revise the requirements for fire protection operability, testing, or inspections. Such amendments simply replace the fire protection TS sections with the standard fire protection license condition. The license condition implements and maintains the NRC-approved fire protection program, including the fire protection requirements previously specified in the TS, in accordance with 10 CFR 50.48. Therefore, such amendments, including the one proposed by the licensee, are administrative in nature and have no effect on the public health and safety.

The August 12, 1997, submittal provided a minor addition to the revised license conditions, at the NRC staff's request, but did not change the scope of the September 26, 1996, application and the initial proposed no significant hazards consideration determination.

## 2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TS to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements: (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled documents, consistent with the standard enunciated in Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." The criteria set forth in the policy statement have been incorporated into 10 CFR 50.36 (60 FR 36953).

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the fire protection programs for all power reactor facilities. Because of the extensive modification of fire protection programs and the number of open issues resulting from staff evaluations, a number of revisions

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and alterations occurred in these programs over the years. Consequently, licensees were requested by GL 86-10 to incorporate the final NRC-approved fire protection program in their UFSARs. In this manner, the fire protection program, including the systems, certain administrative and technical controls, the organization, and other plant features associated with fire protection, would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the fire protection program as described in the UFSAR, should be used to ensure uniform enforcement of the fire protection requirements. Finally, the Commission stated that, with the required actions, licensees may request an amendment to delete the fire protection TS that would now be unnecessary. Subsequently, the NRC issued GL 88-12 to give guidance for the preparation of the license amendment request to implement GL 86-10.

# 3.0 PROPOSED CHANGES

The specific License Condition change proposed by the licensee is as follows:

1. Revise License Condition 2.C.(16) for Unit 1 and License Condition 2.C.(13) for Unit 2 as follows:

TVA shall implement and maintain in effect all provisions of the approved fire protection program referenced in Sequoyah Nuclear Plant's Final Safety Analysis Report and as approved in NRC Safety Evaluation Reports contained in NUREG-0011, Supplements 1, 2, and 5, NUREG-1232, Volume 2, NRC letters dated May 29 and October 6, 1986, and the Safety Evaluation issued on August 12, 1997, for License Amendment Nos. 227/218, subject to the following provision:

TVA may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- 2. The following TS sections have been incorporated, by reference to the SQN Fire Protection Program, into Section 9.5.1 of the UFSAR. As proposed by the licensee, these sections would be deleted from the TS in their entirety:
  - A. TS 3/4.3.3.3.8, "Monitoring Instrumentation -Fire Detection Instrumentation," as well as Table 3.3-11, "Fire Detection Instruments," and the associated bases.
  - B. TS 3/4.7.11, "Fire Suppression Systems," as well as Table 3.7-5, "Fire Hose Stations," and the associated bases.
  - C. TS 3/4.7.12, "Fire Barrier Penetrations," and the associated bases.
  - D. TS 6.2.2.e, "Facility Staff," pertaining to fire brigade composition, and the fire brigade portion of the footnote on p. 6-2.
- 3. Index pages V, IX, and XIV would be revised to reflect the changes discussed above.

# 4.0 <u>EVALUATION</u>

The NRC staff reviewed the license amendment requests for SQN against the guidance provided in GLs 86-10 and 88-12. GL 86-10 requested that the licensee incorporate the NRC-approved fire protection program in its UFSAR for the facility and specified a standard fire protection license condition. GL 88-12 addressed the elements a licensee should include in a license amendment request to remove the fire protection requirements from the plant These elements are (1) the NRC-approved fire protection program must be TS. incorporated into the UFSAR; (2) the Limiting Conditions for Operation (LCOs) and Surveillance Requirements associated with fire detection systems, fire suppression systems, fire barriers, and the administrative controls that address fire brigade staffing would be relocated from the TS (the existing administrative controls associated with fire protection audits and specifications related to the capability for safe shutdown following a fire would be retained); (3) all operational conditions, remedial actions, and test requirements presently included in the TS for these systems, as well as the fire brigade staffing requirements, shall be incorporated into the fire protection program; (4) the standard fire protection license condition specified in GL 86-10 must be included in the facility operating license: (5) the Plant Nuclear Safety Review Committee (Onsite Review Group) shall be given responsibility for the review of the fire protection program and implementing procedures and for the submittal of recommended changes to the Nuclear Safety and Design Review Committee (Offsite or Corporate Review Group); and (6) fire protection program implementation shall be added to the list of elements for which written procedures shall be established. implemented, and maintained.

The licensee submitted its FPR for SQN On August 30, 1996 in accordance with GL 86-10. This report details the SQN Fire Protection Program, which was incorporated by reference into the SQN UFSAR on December 6, 1996. The licensee has, therefore, satisfied Element 1 of GL 88-12.

The licensee stated in its license amendment request submittal of September 26, 1996, that it will incorporate the current TS LCOs and surveillance requirements for the fire detection systems (instrumentation), fire suppression systems, fire barrier penetrations, and the TS requirements related to fire brigade staffing into the SQN Fire Protection Plan, which is part of the FPR submitted on August 30, 1996. In fact, these requirements have already been incorporated into Part 14 of the plan, with a note specifying that implementation of Part 14 is on hold pending NRC approval of the subject TS amendment. Therefore, the licensee has satisfied Elements 2 and 3 of GL 88-12.

The licensee proposed incorporating the standard fire protection license condition specified in GL 86-10 for SQN. The licensee has, therefore, satisfied Element 4 of GL 88-12.

To satisfy Elements 5 and 6 of GL 88-12, the licensee addressed changes to the administrative controls sections of the TS. The SQN TS already support the Fire Protection Program, inluding TS 6.8.1.f, which requires written procedures for Fire Protection Program implementation. The current administrative controls for fire protection are consistent with the administrative controls for the emergency and security plans. The licensee

already requires the Plant Operations Review Committee, with overview by the Nuclear Safety Review Board, to review changes to the Fire Protection Program. This requirement is in Part 8.1 of the Fire Protection Plan submitted on August 30, 1996. The licensee has, therefore, satisfied Elements 5 and 6 of GL 88-12.

Therefore, the licensee's proposed TS amendments for SQN are in accordance with NRC staff guidance provided in GLs 86-10 and 88-12.

In summary, the licensee has proposed to incorporate the existing TS fire protection requirements as stated above into the Fire Protection Program, which is, by reference, incorporated into the UFSAR. This conforms to staff guidance in GL 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications," for removing unnecessary fire protection TS in four major areas: fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. In addition, incorporating these requirements into the UFSAR is consistent with NUREG-1431, "Standard Technical Specifications, Westinghouse Plants" and 10 CFR 50.36, as amended, because these TS do not impact reactor operations, do not identify a parameter which is an initial condition assumption for a design-basis accident or transient, do not identify a significant abnormal degradation of a design-basis event.

The fire protection plan required by 10 CFR 50.48, as implemented and maintained by the fire protection license condition, provides reasonable assurance that fires will not give rise to an immediate threat to public health and safety. Although there are aspects of the fire detection and mitigation functions that have been determined to be risk significant, such that Criterion 4 of 10 CFR 50.36 would otherwise seem to apply, the minimum requirements for those functions were established in GDC 3 and 10 CFR 50.48, and further controls are not necessary since the licensee must comply with these minimum requirements regardless of whether they are restated in the TS or not.

The licensee's fire protection program is required by 10 CFR 50.48, and any changes to that program are governed by 10 CFR 50.48 and license conditions 2.C.(16) (Unit 1) and 2.C.(13) (Unit 2), set forth above. Therefore, changes to the requirements relocated to the UFSAR will be controlled in accordance with 10 CFR 50.59.

These relocated requirements relating to fire protection features are not required to be in the TS under 10 CFR 50.36 or other regulations, or by Section 182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. In addition, the staff finds that sufficient regulatory controls exist under 10 CFR 50.48 and 10 CFR 50.59 to address future changes to these requirements. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the licensee's UFSAR.

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### 5.0 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.

# 6.0 ENVIRONMENTAL CONSIDERATION

The amendments change the requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. 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 the amendments involve no significant hazards consideration and there has been no public comment on such finding (62 FR 35843). The amendments also change administrative procedures or reporting requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 7.0 <u>CONCLUSION</u>

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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Hernan

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Dated: August 12, 1997