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Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

William R. Lagergren, Jr.
Site Vice President, Watts Bar Nuclear Plant

OCT 31 2001

TVA-WBN-TS-01-14 10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

In the Matter of) Docket Nos. 50-390
Tennessee Valley Authority)

WATTS BAR NUCLEAR PLANT (WBN) - UNIT 1 - APPLICATION FOR TECHNICAL SPECIFICATION (TS) IMPROVEMENT TO ELIMINATE REQUIREMENTS FOR POST ACCIDENT SAMPLING SYSTEM USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) - TS CHANGE NO. 01-14

In accordance with the provisions of 10 CFR 50.4 and 50.90, TVA is submitting a request for an amendment to WBN's Facility Operating License NPF-90 to change the TS for Unit 1. The proposed amendment deletes the program requirements of TS 5.7.2.6, "Post Accident Sampling System (PASS)." The changes are consistent with the NRC approved Technical Specification Task Force (TSTF) Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System." The availability of this TS improvement was announced in the Federal Register on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

TVA proposes to eliminate the requirements for PASS in 3 steps:

Step 1: Eliminate PASS from the TSs and incorporate the modified requirements listed as commitments in Enclosure 4 of this letter to the Final Safety Analysis Report (FSAR) within 60 days of NRC approval of the subject amendment.

D030

Rec'd 12/7/01

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Continue current post accident sampling and analysis capability through the PASS facility (hardware unchanged) until the design basis is changed through the formal design change process.

Step 2: If economically justified, modify plant documents for post accident sampling requirements based on implementation of WCAP-14986, R1.

Step 3: If economically justified, process a design change to remove or abandon the current PASS facility and equipment from plant use in accordance with the TVA project approval and design change process. The modified sampling requirement in Enclosure 4 would remain in the FSAR as the regulatory commitments.

TVA has determined that there are no significant hazards considerations associated with the proposed TS change and that the change is exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). The WBN Plant Operations Review Committee and the Nuclear Safety Review Board have reviewed this proposed change and determined that operation of WBN Unit 1, in accordance with the proposed change, will not endanger the health and safety of the public. Additionally, in accordance with 10 CFR 50.91, TVA is sending a copy of this letter to the designated Tennessee Official.

Enclosure 1 provides the description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. This includes the determination that the proposed change does not involve a significant hazards consideration, and is exempt from environmental review. Enclosure 2 contains copies of the appropriate TS pages marked up to show the proposed change. Enclosure 3 forwards the revised TS page and TS Bases page that incorporate the proposed change. Enclosure 4 provides a list of commitments made in this letter.

TVA currently has no specific need date for approval of the proposed license amendment. The revised TS will be made effective within 60 days of NRC approval.

OCT 3 1 2001

If you have any questions about this request, please contact P. L. Pace at (423) 365-1824.

Sincerely,

for W. R. Lagergren

Subscribed and sworn to before me
on this 31 day of October 2001

Loretta J. Masterson
Notary Public

My Commission Expires 4/20/2004

Enclosures
cc: See page 4

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PLP:
Enclosures
cc (Enclosures):

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Sequoyah Licensing Files, OPS 4C-SQN
EDMS, WT 3B-K

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1
DOCKET NO. 390

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE NO. 01-14
DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

I. DESCRIPTION OF THE PROPOSED CHANGE

The proposed License amendment deletes the program requirements of TS 5.7.2.6, "Post Accident Sampling." This section of the Technical Specifications currently reads as follows:

5.7.2.6, Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

The proposed amendment is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. As part of the requested amendment, TVA is not proposing any significant variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000. The availability of this TS improvement was announced in the Federal Register, Volume 65, No. 211, on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

II. REASON FOR THE PROPOSED CHANGE

The requested amendment has been proposed to take advantage of TSTF-366 using the CLIIP proposed by the NRC on this issue. TVA has concluded that the justifications presented in the TSTF model safety evaluation prepared by the NRC staff are applicable to WBN Unit 1 and justify this amendment.

III. SAFETY ANALYSIS

TVA has performed a review of the safety evaluation published on October 31, 2000. This included a review of the NRC staff's evaluation as well as the supporting information provided for TSTF-366 (i.e., WCAP-14986-A, Revision 1, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10 and May 22, 2000). Based on the reviews, TVA considers the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff to be applicable to WBN Unit 1 and to sufficiently justify this proposed amendment.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TVA has reviewed the no significant hazards consideration determination published on October 31, 2000, as part of the CLIIP. TVA has concluded that the determination presented in the notice is applicable to WBN and the determination is hereby incorporated by reference.

TVA has concluded that operation of WBN Unit 1, in accordance with the proposed change to the TS, does not involve a significant hazards consideration.

V. COMMITMENTS

As discussed in the notice of availability published in Federal Register on October 31, 2000, for this TS improvement, plant-specific verifications will be performed as described below and the FSAR will be revised accordingly:

1. TVA will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in technical

procedures and implemented in accordance with the proposed License amendment.

2. The capability for classifying fuel damage events at the Alert level threshold will be established at radioactivity levels of greater than or equal to 300 μCi/gm dose equivalent iodine. This capability will be described in emergency plan implementing procedures.

3. TVA will establish the capability to monitor radioactive iodines that have been released to offsite environs. This capability will be described in chemistry and radiation protection implementing procedures.

The procedures discussed above will be developed and/or revised as necessary in conjunction with implementation of the design change for eliminating PASS from the plant.

VI. ENVIRONMENTAL IMPACT CONSIDERATION

TVA has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIIP. TVA has concluded that the staff's findings presented in that evaluation are applicable to WBN and the evaluation is hereby incorporated by reference for this application.

VII. REFERENCES

1. Industry/TSTF Standard Technical Specification Changes Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)."

2. Federal Register, Volume 65, No. 211, "Notice of Availability for Referencing in License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems using the Consolidated Line Item Improvement Process," dated October 31, 2000.

3. Westinghouse Owners Group (WOG) topical report WCAP-14986A, Rev. 1, "Post Accident Sampling System Requirements: A Technical Basis," July 2000.

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE
MARKED PAGES

I. AFFECTED PAGE LIST

Technical Specification Page 5.0-11

Technical Specification Bases Page B 3.3-137

II. MARKED PAGES

See attached.

5.7 Procedures, Programs, and Manuals

5.7.2.3 Offsite Dose Calculation Manual (ODCM) (continued)

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.7.2.4 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Containment Spray, Safety Injection, Residual Heat Removal, Chemical and Volume Control, Reactor Coolant System Sampling, and Waste Gas. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.7.2.5 (removed from Technical Specifications)

5.7.2.6 ~~Post Accident Sampling~~

~~This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:~~

~~a. Training of personnel;~~

~~b. Procedures for sampling and analysis; and~~

~~c. Provisions for maintenance of sampling and analysis equipment.~~

add insert:
(removed from Technical Specifications)

(continued)

BASES

ACTIONS
(continued)

D.1

Condition D applies when two hydrogen monitor channels are inoperable. Required Action D.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours.

replace marked text with:
low probability

The 72 hour Completion Time is reasonable based on the backup capability of the Post Accident Sampling System to monitor the hydrogen concentration for evaluation of core damage and to provide ~~information for operator decisions~~. Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.

E.1

Condition E applies when the Required Action and associated Completion Time of Condition C or D are not met. Required Action E.1 requires entering the appropriate Condition referenced in Table 3.3.3-1 for the channel immediately. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met any Required Action of Condition C or D, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

F.1 and F.2

If the Required Action and associated Completion Time of Conditions C or D are not met and Table 3.3.3-1 directs entry into Condition F, the plant must be brought to a MODE where the requirements of this LCO do not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and MODE 4 within 12 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

ENCLOSURE 3

TENNESSEE VALLEY AUTHORITY
SEQUOYAH PLANT (WBN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE
REVISED PAGES

I. AFFECTED PAGE LIST

Technical Specification Page 5.0-11

Technical Specification Bases Page B 3.3-137

II. REVISED PAGES

See attached.

5.7 Procedures, Programs, and Manuals

5.7.2.3 Offsite Dose Calculation Manual (ODCM) (continued)

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.7.2.4 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Containment Spray, Safety Injection, Residual Heat Removal, Chemical and Volume Control, Reactor Coolant System Sampling, and Waste Gas. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.7.2.5 (removed from Technical Specifications)

5.7.2.6 (removed from Technical Specifications)

(continued)

BASES

ACTIONS (continued)

D.1

Condition D applies when two hydrogen monitor channels are inoperable. Required Action D.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours.

The 72 hour Completion Time is reasonable based on the low probability that a LOCA (which would cause core damage) would occur during this time.

E.1

Condition E applies when the Required Action and associated Completion Time of Condition C or D are not met. Required Action E.1 requires entering the appropriate Condition referenced in Table 3.3.3-1 for the channel immediately. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met any Required Action of Condition C or D, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

F.1 and F.2

If the Required Action and associated Completion Time of Conditions C or D are not met and Table 3.3.3-1 directs entry into Condition F, the plant must be brought to a MODE where the requirements of this LCO do not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and MODE 4 within 12 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

ENCLOSURE 4

LIST OF COMMITMENTS

As discussed in the notice of availability published in Federal Register on October 31, 2000, for this TS improvement, plant-specific verifications will be performed as described below and the FSAR will be revised accordingly:

1. TVA will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in technical procedures and implemented in accordance with the License amendment.

2. The capability for classifying fuel damage events at the Alert level threshold will be established at radioactivity levels of greater than or equal to 300 μCi/gm dose equivalent iodine. This capability will be described in emergency plan implementing procedures.

3. TVA will establish the capability to monitor radioactive iodines that have been released to offsite environs. This capability will be described in chemistry and radiation protection implementing procedures.

The procedures discussed above will be developed and/or revised as necessary in conjunction with implementation of the design change for eliminating PASS from the plant.