

February 11, 2003

Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENTS REGARDING TECHNICAL SPECIFICATION CHANGE
NO. 01-03 (TAC NOS. MB4660 AND MB4661)

Dear Mr. Scalice:

The Commission has issued the enclosed Amendment No. 281 to Facility Operating License No. DPR-77 and Amendment No. 272 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 March 4, 2002. The amendments requested to delete one definition and modify several subsections contained in Technical Specification Section 6.0, Administrative Controls. These proposed changes have been prepared based on existing NRC guidance.

The staff's Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Raj K. Anand, Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-327 and 50-328

Enclosures: 1. Amendment No. 281
to License No. DPR-77
2. Amendment No. 272
to License No. DPR-79
3. Safety Evaluation

cc w/enclosures: See next page

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TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-327

SEQUOYAH NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 281
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 March 4, 2002, 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. 281, 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 no later than 45 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Allen G. Howe, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: February 11, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 281

FACILITY OPERATING LICENSE NO. DPR-77

DOCKET NO. 50-327

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

REMOVE

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TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-328

SEQUOYAH NUCLEAR PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 272
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 March 4, 2002, 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. 272, 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 no later than 45 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Allen G. Howe, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: February 11, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 272

FACILITY OPERATING LICENSE NO. DPR-79

DOCKET NO. 50-328

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain a vertical line(s) indicating the area of change.

REMOVE

Index Page I

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 281 TO FACILITY OPERATING LICENSE NO. DPR-77
AND AMENDMENT NO. 272 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 March 4, 2002, the Tennessee Valley Authority (TVA) proposed to the U.S. Nuclear Regulatory Commission (NRC), an amendment to the Technical Specifications (TSs) for Sequoyah Nuclear Plant (SQN), Units 1 and 2. The requested changes would delete one definition and modify several subsections contained in TS Section 6.0, Administrative Controls. These proposed changes have been prepared based on existing NRC guidance.

2.0 BACKGROUND

The proposed revision to the SQN TSs for Units 1 and 2 propose changes in the following areas (with the referenced NRC-approved documents cited):

Definition 1.17 - "Member(s) of the Public." (NUREG-1431, Revision 2)

- TS 6.2.2.g, Overtime. (TS Traveler Form (TSTF)-258, Revision 4)
- TS 6.3, Facility Staff Qualifications. (TSTF-258, Revision 4)
- TS 6.8.4.a., Primary Coolant Sources Outside Containment. (TSTF-299)
- TS 6.8.4.f, Radioactive Effluent Controls Program. (TSTF-258, Revision 4 and TSTF-308, Revision 1)
- TS 6.8.4.i, Deletion of the "Configuration Risk Management Program." (10 CFR 50.65)
- TS 6.9.1.5, The second paragraph in associated with specific activity limits. (NUREG-1431, Revision 2)
- TS 6.9.1.10, Deletion of the phrase, "including the documentation of all challenges to the PORVs or safety valves."

Enclosure

- TS 6.9.1.14, Monthly Reactor Operating Report contents revision. (TSTF-258, Revision 4)
- TS 6.12, High Radiation Areas revision. (TSTF-258, Revision 4)
- TS 6.15, Deletion of Major Changes to Radioactive Waste Treatment Systems (Liquid, Gaseous, and Solid). (NUREG-1431, Revision 2)

3.0 EVALUATION

3.1 Summary of changes

TVA's letter requested to amend the SQN Operating Licenses DPR-77 and DPR-79 to change the TSs for Unit 1 and Unit 2.

The specific proposed changes are as follows:

1. Definition 1.17, "MEMBERS OF THE PUBLIC," text would be deleted and replaced with the word "DELETED" both in the Index and the text describing the definition. Additionally, the phrase "MEMBERS OF THE PUBLIC" contained in TSs 6.8.4.f, 6.8.4.f.4, 6.8.4.f.9, and 6.8.4.f.10 would be changed to lower case script.
2. TS 6.2.2.g currently states that procedures shall be developed to limit working hours of the staff who perform safety-related functions. It details the combination of hours that may be worked by an individual. Additionally, it discusses who may authorize deviation from these rules. This section would be revised to read:

Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators [SROs], reactor operators [ROs], health physicists, assistant unit operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines would be authorized in advance by the Plant Manager or the Plant Manager's designee, in accordance with approved administrative procedures and documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines would not be authorized.

Controls would be included in the procedures to require that a periodic independent review is to be conducted to ensure that excessive hours have not been assigned.

3. The following section would be added to TS 6.3, Facility Staff Qualifications: "6.3.2 For the purpose of 10 CFR [Title 10, *Code of Federal Regulations*] 55.4, a licensed senior reactor operator and a licensed reactor operator are those individuals who, in addition to

meeting the requirements of TS 6.3.1, perform the functions described in 10 CFR 50.4(m).”

4. The word “reduce” in TS 6.8.4.a would be replaced with the word “minimize.”
5. TS 6.8.4.a.ii currently states: “Integrated leak test requirements for each system at refueling cycle intervals or less.” It would be revised to state: “Integrated leak test requirements for each system at least once per 18 months.” Additionally, “The provisions of SR [Surveillance Requirement] 4.0.2 are applicable.” would be added to the end of TS 6.8.4.
6. TS 6.8.4.f.2 currently states: “stated in 10 CFR 20.1001 - 20.2401, Appendix B, Table 2, Column 2.” This would be revised to read: “values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402.”
7. TS 6.8.4.f.5 would be revised to read: “Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM [Offsite Dose Calculation Manual] at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days.”
8. TS 6.8.4.f.7 currently includes the phrase “SHALL BE LIMITED to the following:” which would be revised to read: “shall be in accordance with the following:”.
9. TS 6.8.4.f.7.1 - The word “total” would be replaced with the word “whole.”
10. TS 6.8.4.f.10 - The phrase “, beyond the site boundary,” would be added after the phrase “members of the public.”
11. TS 6.8.4.f - “The provisions of SR 4.0.2 and 4.0.3 are applicable to the radioactive effluent controls program surveillance frequency” would be added at the end of the sentence.
12. TS 6.8.4.i, “Configuration Risk Management Program,” text would be deleted and the word “DELETED” added.
13. TS 6.9.1.5, second paragraph, would be changed to delete the reporting requirements when primary coolant specific activity exceeds the TS limit.
14. TS 6.9.1.10 - The phrase “including documentation of all challenges to the PORVs [power-operated relief valves] or Safety Valves,” would be deleted as it pertains to the Monthly Reactor Operating Reports.
15. TS 6.12, “High Radiation Area,” would be deleted and replaced with the following:

6.12 High Radiation Area

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

- 6.12.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation
- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
 - b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent, associated radiation surveys, and other appropriate radiation protection equipment and measures.
 - c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
 - d. Each individual or group entering such an area shall possess:
 1. A radiation monitoring device that continuously displays radiation dose rates in the area; or
 2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or
 4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

- (ii) Under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
 - e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
- 6.12.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation
- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
 - 1. All such doors and gate keys shall be maintained under the administrative control of the shift manager, radiation protection manager, or his or her designee.
 - 2. Doors and gates shall remain locked except when needed for personnel or equipment access.
 - b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent, associated radiation surveys, and other appropriate radiation protection equipment and measures.
 - c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
 - d. Each individual or group entering such an area shall possess:
 - 1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or
 - 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure

within the area with the means to communicate with and control every individual in the area, or

3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for Controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.
 - e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.
 - f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.
16. TS 6.15, Major Changes To Radioactive Waste Treatment Systems (Liquid, Gaseous, and Solid), would be deleted.

3.2 Licensee's Justification and NRC Staff Evaluation

TVA is proposing these changes to Section 6.0, "Administrative Controls," of the SQN TSs (including the deletion of a definition and a Bases change) to incorporate provisions of various TS improvements approved by the NRC staff. These changes are contained in either TSTF-258, Revision 4 (with minor changes), TSTF-299, or TSTF-308, Revision 1, all of which set forth modifications to NUREG-1431, "Westinghouse Improved Standard Technical Specifications." Additionally, the deletion of the definition and Section 6.15, "Major Changes To Radioactive Waste Treatment Systems," is based

on these items not being contained in Revision 2 of NUREG-1431. The basis for these changes is TVA's support of the effort to implement the various changes to the Standard TSs to provide consistency from site to site, being that both the Browns Ferry and Watts Bar have Standard TSs. TVA has implemented the remaining sections of TSTF-258, Revision 4, by means of the previously submitted TS Change 99-20 on August 4, 2000. TVA has not expressed their intention of submitting a request to convert the Sequoyah TSs to the NUREG-1431, Revision 2, format.

The following provides the licensee's justification and the NRC staff evaluation for each change.

1. Definition 1.17, "MEMBERS OF THE PUBLIC," would be deleted.

Justification: Based on the proposed revision to TS 6.8.4.f that no longer contains this definition, it may be deleted. Additionally, it is not contained in NUREG-1431, Revision 2; therefore, it is being deleted in order to remain consistent with the latest revision to Standard TSs.

Staff Evaluation: Deletion of this definition does not affect the substance of any TS requirement. In addition, the definition is not needed for clarity. Accordingly, the staff finds the change acceptable.

2. Specific working hour limits in existing TS Section 6.2.2.g would be modified to reference administrative procedures as the means of controlling working hours. Titles within TS 6.2.2.g are also revised to match TSTF-258, Revision 4.

Justification: The inclusion of working hour limits are not required to be in the TSs by 10 CFR 50.36(c)(5). Therefore, it is acceptable that requirements for controlling working hours of reactor plant staff be described in site procedures. These administrative procedures require a deliberate decision-making process to minimize the potential for impaired personnel performance. The proposed TS changes are also consistent with the recommendations in the April 9, 1997, letter from C. Grimes (NRC) to J. Davis (Nuclear Energy Institute [NEI]).

Additionally, the existing TS provision, "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" is being deleted. There is no guidance in Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," that discusses these additional controls. The requirement to have the Plant Manager (or his designee) review individual overtime on a monthly basis is unnecessary since sufficient administrative controls and policies already exist in site procedures. In lieu of this approval requirement, a new TS provision is being added to require a periodic independent review of overtime usage, which will ensure that the administrative procedures for overtime use are being effectively implemented.

The proposed TS change, which delegates the details of working hour controls to site processes, is considered an administrative change which will continue to provide reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operation.

Staff Evaluation: Generic letter 82-12 forwarded to licensees the NRC revised policy statement on working hour limits and recommended that the Administrative Controls section of TSs be revised to require plant procedures for implementing these guidelines. The specific working hour limits were not required to be in the TSs. The requirement to develop and implement plant procedures satisfies the requirement for administrative controls contained in 10 CFR 50.36(c)(5). The April 9, 1997, letter from C. Grimes to J. Davis provided a model for including the requirements in the Administrative Controls section of TSs. The proposed changes are consistent with the requirements of 10 CFR 50.36(c)(5) and the recommendations of Generic Letter 82-12, and are, therefore, acceptable.

3. TS 6.3, "Facility Staff Qualifications," would add an additional section.

Justification: The new TS Section 6.3.2 would incorporate the regulatory definitions for the SRO and RO positions for the purpose of applying 10 CFR 55.4, which provides the stipulation, "Actively performing the functions of an operator or senior operator means that an individual has a position on the shift crew that requires the individual to be licensed as defined in the facility's technical specifications, and that...." Adding Paragraph 6.3.2 ensures that there is no misunderstanding when complying with 10 CFR 55.4 requirements. Adding this paragraph is consistent with the recommendations of the April 9, 1997, letter from C. Grimes (NRC) to J. Davis (NEI).

The minimum staffing requirements stipulated in 10 CFR 50.54(m), for unit members actively performing the functions of an operator or senior operator, can be exceeded by stipulating the enhanced staffing requirements in paragraph 6.3.2. This means the site can take credit for more than the minimum number of watchstanders required by TSs provided that there are administrative controls which assure that functions and duties are divided and rotated in a manner which provides each watchstander meaningful and significant opportunity to maintain proficiency in the performance of the functions of an RO and/or SRO. This added TS provision is considered an administrative change which does not change any existing manning requirements and is consistent with TSTF-258, Revision 4.

Staff Evaluation: The proposed change is consistent with the April 9, 1997, letter from C. Grimes to J. Davis, which recommended the change to eliminate misunderstanding when complying with 10 CFR 55.4 requirements. The minimum shift staffing will be satisfied by appropriately licensed personnel who are actively carrying out the responsibilities of their assigned positions. It also provides the licensee with the flexibility of taking credit for more than the minimum number of watchstanders. Accordingly, the proposed change is acceptable.

4. The word "reduce" in TS 6.8.4.a would be replaced with the word "minimize."

Justification: This is an administrative change as "reduce" and "minimize" are very similar in definition; therefore, the requirements in this TS remain unchanged. The reason for this change is to adapt the wording of NUREG-1431, Revision 2.

Staff Evaluation: The proposed wording change is essentially an editorial change to align the SQN TS wording with NUREG-1431, Revision 2. Therefore, it is acceptable.

5. TS 6.8.4.a.ii would be revised to state: "Integrated leak test requirements for each system at least once per 18 months." Additionally, "The provisions of SR 4.0.2 are applicable." would be added at the end of TS 6.8.4.

Justification: The present form of this TS provides integrated leak test requirements for each system at refueling cycle intervals or less. The proposed change affects only the interval at which leak rate tests are performed. Under the proposed change, leak rate testing will be performed at 18-month intervals regardless of actual refueling cycle lengths, and if an extension of that interval becomes necessary due to scheduling consideration, the provisions of SR 4.0.2 will provide the necessary flexibility. The TS basis for SR 4.0.2 states, that the 25-percent extension facilitates surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the surveillance. Therefore, the maximum extension that can be applied to those portions of systems outside of containment subject to being leak tested under TS Section 6.8.4.a.ii would be 25 percent of 18 months or 4.5 months.

Additionally, the scheduling flexibility provided by this change will not reduce the effectiveness of the leak test requirements and it will still meet the requirements of Item III.D.1.1, "Integrity of Systems Outside Containment Likely to Contain Radioactive Material for Pressurized-Water Reactors and Boiling-Water Reactors," in NUREG-0737, "Clarification of TMI [Three Mile Island] Action Plan Requirements." This change is consistent with the recommended change in TSTF-299.

Staff Evaluation: The specification of an 18-month frequency for leak testing is equivalent to the current nominal refueling cycle for SQN. Thus, there is no reduction in the requirement. The application of SR 4.0.2 will provide the flexibility to address cycle variations due to operational issues. Treating the testing as a surveillance requirement will result in less uncertainty and provide better administrative control. Therefore, the proposed change is acceptable.

6. TS 6.8.4.f.2 would be revised to conform to the wording in the Standard TSs. A more specific reference to the pertinent section of 10 CFR Part 20 would be substituted.

Justification: This is an administrative change and no changes to TS limits are involved. Additionally, this change would be consistent with TSTF-258, Revision 4.

Staff Evaluation: The proposed change does not revise the substantive requirements of the current specification and is primarily editorial. Therefore, it is acceptable.

7. TS 6.8.4.f.5 pertaining to cumulative and projected dose would be deleted and replaced with the wording in the Standard TSs, which separates the projected dose from the cumulative dose program requirements.

Justification: This change is a result of TSTF-308, Revision 1. Generic Letter 89-01 appears to have combined the original SRs 4.11.1.2 and 4.11.1.3 for the cumulative and projected doses. In combining these requirements in Generic Letter 89-01, the new program element can be interpreted to require determining the projected dose

contribution for the current calendar quarter and current calendar year every 31 days. Therefore, this change clarifies the wording in TS 6.8.4.f.5 to not require dose projections for a calendar quarter and a calendar year every 31 days. This separation is consistent with TSTF-308, Revision 1.

Staff Evaluation: The proposed change does not revise any substantive requirements of this TS. It separates the requirements for determining cumulative and projected doses to avoid misinterpretation. Therefore, it is acceptable.

8. TS 6.8.4.f.7 present phrase "SHALL BE LIMITED to the following:" would be revised to read "shall be in accordance with the following:"

Justification: The wording is modified for consistency with TSTF-258, Revision 4 wording. The change is administrative and has no effect on application of the TS requirements.

Staff Evaluation: The proposed change does not revise any substantive TS requirements and is editorial in nature. Therefore, it is acceptable.

9. The word "total" in TS 6.8.4.f.7)1 would be replaced with the word "whole."

Justification: The words "total body" are replaced by "whole body," which is more appropriate nomenclature. "Whole body" is used in NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors, Generic Letter 89-10, Supplement No. 1." The change is administrative and has no effect on application of the TS requirements.

Staff Evaluation: The proposed change does not revise any substantive TS requirements. It is editorial in nature and revises terminology to be consistent with regulatory guidance documents. Therefore, the proposed change is acceptable.

10. The phrase ", beyond the site boundary," would be added after the phrase "members of the public" in TS 6.8.4.f.10.

Justification: The TS wording regarding the site boundary is modified for consistency with TSTF-258, Revision 4 wording. The change is administrative and has no effect on application of the TS requirements.

Staff Evaluation: The revised wording reflects more precisely the intent of TSTF-258, Revision 4. Therefore, the proposed change is acceptable.

11. The sentence "The provisions of SRs 4.0.2 and 4.0.3 are applicable to the radioactive effluent controls program surveillance frequency." would be added at the end of TS 6.8.4.f.

Justification: A statement is being added at the end of TS 6.8.4.f to allow the application of SRs provisions 4.0.2 and 4.0.3 to the Radioactive Effluent Controls Program surveillance frequencies. This addition provides scheduling flexibility. SR 4.0.2 permits a 25-percent extension of the interval specified in the frequency and is generally applied

to all SRs including Section 6.0 program based SRs. Allowing a 25-percent extension in the frequency of performing the Radioactive Effluent Controls Program surveillances will have no effect on outcome of the effluent dose calculations. SR 4.0.3 is added in association with SR 4.0.2 to maintain consistency of TS application. The proposed TS change maintains the same overall level of effluent control program controls while providing operational flexibility. Additionally, this change is consistent with TSTF-258, Revision 4.

Staff Evaluation: The proposed change will have no effect on the outcome of effluent dose calculations, and will provide administrative controls on the Radioactive Effluent Controls Program surveillance frequencies consistent with TSTF-258, Revision 4. Therefore, the proposed change is acceptable.

12. TS 6.8.4.i, "Configuration Risk Management Program," text would be deleted and the word "DELETED" added.

Justification: Federal regulations, 10 CFR 50.65(a)(4) state: "Before performing maintenance activities (including but not limited surveillance, post-maintenance testing, and corrective and preventive maintenance), the licensee shall assess and manage the increase in risk that may result from the proposed maintenance activities. The scope of the assessment may be limited to structures, systems, and components that a risk-informed evaluation process has shown to be significant to public health and safety." Additionally, on July 19, 1999, NRC issued 10 CFR 50.65, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The documentation is contained in Volume 64, No. 137, Section 38551 of the *Federal Register*. In Section 5 of this issuance there is a discussion of the "Regulatory Controls Overlapping Technical Specifications." In this section, NRC specifically discusses the Configuration Risk Management Program (CRMP) and states that after revisions to the maintenance rule are completed, the NRC will expeditiously support licensees' requests to remove the CRMP requirements from plant TS. Based on this recognized duplication, the requirements of TS 6.8.4.i may be deleted as redundant to 10 CFR 50.65.

Staff Evaluation: The licensee has implemented 10 CFR 50.65(a)(4), which contains requirements for configuration risk management of proposed maintenance activities. Therefore, deletion of these redundant requirements from the TS is acceptable.

13. The second paragraph in TS 6.9.1.5 would be deleted as it is now a duplicate effort with the implementation of the new NRC Performance Indicator (PI) data requirements.

Justification: The PI that is associated with the Reactor Coolant System Specific (RCS) Activity is reported quarterly as a percentage of the TS limit. This is on a continuous basis and not on special occasions when the specific activity exceeds the TS limits. Trend data is already available for review. Should the TS limit be exceeded for the 48 hours and if a plant shutdown is required, a detailed report will be provided in accordance with 10 CFR 50.73; therefore, this portion of TS 6.9.1.5 may be deleted as it duplicates present NRC requirements. This change is consistent with NUREG 1431, Revision 2.

Staff Evaluation: Routine reporting of RCS Specific Activity through the NRC PI program, and detailed 10 CFR 50.73 event reports, if required, will provide adequate

information. Deletion of this paragraph is consistent with NUREG-1431, Revision 2. Therefore, it is acceptable.

14. The phrase "including documentation of all challenges to the PORVs or Safety Valves," is deleted from TS 6.9.1.10 as it pertains to the Monthly Reactor Operating Reports.

Justification: The reporting of safety and relief valve failures and challenges was originally based on the guidance in NUREG-0694, "TMI-Related Requirements for New Operating Licenses." The guidance of NUREG-0694 states: "Assure that any failure of a Power Operated Relief Valve (PORV) or safety valve to close will be reported to the NRC promptly. All challenges to the PORVs or safety valves should be documented in the annual report." This latter annual reporting requirement was carried forth in NUREG-1431, Revision 1, Standard TS Section 5.6.4, but later deleted in Revision 2 of NUREG-1431, based on TSTF-258, Revision 4.

NRC Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," requests the submittal of less information in the Monthly Operating Report. The generic letter identifies what needs to be reported to support the NRC Performance Indicator Program and availability and capacity statistics. The generic letter does not specifically identify the need to report challenges to PORVs and safety valves. Malfunctions of PORVs and safety valves during reportable plant transients would be discussed in Licensee Event Reports and the special reporting of PORV and safety valve challenges serves no explicit purpose. Therefore, it is acceptable to delete the requirement to provide a monthly report of all challenges to the PORVs and safety valves.

Staff Evaluation: Generic Letter 97-02 does not require reporting of challenges to the PORVs or Safety Valves, and advises licensees to take appropriate actions to remove unnecessary reporting requirements from TS. This change would remove an unnecessary reporting requirement. Therefore, it is acceptable.

15. TS 6.12, "High Radiation Area," would be deleted and replaced with the wording in the Standard TSs.

Justification: Section 6.12 is being revised in accordance with 10 CFR 20.1601(c). It also updates acceptable alternate controls to those provided in 10 CFR 20.1601 based on TSTF-258, Revision 4. Additionally, TVA is proposing two minor changes to the standard TSs for this section. The first change is to replace the wording in TS 6.12.1.b and 6.12.2.b "that includes specification of radiation dose rates in the immediate work area(s)" with ", associated radiation survey,". The purpose of this change is to tailor the TS wording to be consistent with existing administrative controls that achieve the same objective. The SQN RWPs do not contain dose rates but the radiation surveys do. All RWPs have a radiation survey. This wording is essentially the same as the standard TS. The other change is a rewording of TS 6.12.2.a.2 to prevent any misinterpretation of when a door is locked. As the standard TSs reads now, the door must be unlocked and locked as personnel enter and leave even though it is continuously guarded. For industrial safety reasons, the door should remain unlocked when personnel are working in the room in case of an accident. The continuous guard will prevent any unauthorized access to the room; therefore, the intent of the original TS remains. The SQN revision is based on NUREG-1431, Revision 2, that incorporates TSTF-258, Revision 4, with

minor wording changes; therefore, this change is acceptable as it is more conservative than the existing TS 6.12.

Staff Evaluation: The proposed change incorporates the essential protective measures included in the current TS, and adds additional requirements consistent with the current revision of 10 CFR Part 20 and NUREG-1431, Revision 2. Deviations from the wording of NUREG-1431, Revision 2, address plant-specific issues, maintain the intent of the Standard TS and provide an acceptable level of safety. Therefore, the proposed change is acceptable.

16. TS 6.15, "Major Changes to Radioactive Waste Treatment Systems (Liquid, Gaseous, and Solid)," is deleted.

Justification: This section is deleted based on the requirements contained in 10 CFR 50.59, Changes, Tests, and Experiments; and 10 CFR 50.71(e), "Maintenance of Records, Making of Reports (Final Safety Analysis Report [FSAR])." The Radioactive Waste Treatment Systems (Liquid, Gaseous, and Solid) are described in Chapter 11 of the SQN FSAR and any changes are required to be reviewed in accordance with 10 CFR 50.59 and appropriate plant procedures. The FSAR is then periodically updated and transmitted to NRC. Based on this, the deletion of this TS is considered an administrative change as the TS is redundant to existing CFR requirements. Additionally, this change is consistent with NUREG-1431, Revision 2.

Staff Evaluation: The current TS requirements are redundant based on the requirements of 10 CFR 50.59 and 10 CFR 50.71, and their deletion will not preclude appropriate reporting of changes in radioactive waste treatment systems. Therefore, the proposed change is acceptable.

4.0 STATE CONSULTATION

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

5.0 ENVIRONMENTAL CONSIDERATION

These amendments change record keeping, reporting, or administrative procedures or requirements. 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 (67 FR 18649). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(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 amendment.

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

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Date: February 11, 2003

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