

March 26, 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, UNIT 2 - ISSUANCE OF AMENDMENT  
REGARDING HEAVY LOAD LIFTS ARE PERFORMED FOR THE UNIT 1  
(TAC NO. MB6725)

Dear Mr. Scalice:

The Commission has issued the enclosed Amendment No. 273 to Facility Operating License No. DPR-79 for the Sequoyah Nuclear Plant, Unit 2. This amendment is in response to your application dated November 15, 2002, as supplemented by letters dated February 19, 2003 and February 26, 2003. The proposed one-time condition would establish requirements for safe operation of Unit 2 while heavy load lifts are performed for the Unit 1 steam generator replacement outage. The license condition and associated regulatory commitments provide reasonable assurance that Unit 2 may safely operate during heavy load lift activities. The provisions for heavy load lifts are described in Topical Report 24370-TR-C-002, "Rigging and Heavy Load Handling" (the Topical), which was previously submitted on April 15, 2002, for Nuclear Regulatory Commission (NRC) review and approval. The Topical contains prerequisite actions for heavy load movement, active monitoring during heavy load movement, and compensatory actions in response to the unlikely event of a heavy load drop. The technical issues associated with the Topical were reviewed and approved in a separate NRC safety evaluation dated March 25, 2003. 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/*

Michael L. Marshall, Project Manager, Section 2  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-328

Enclosures: 1. Amendment No. 273 to  
License No. DPR-79  
2. Safety Evaluation

cc w/enclosures: See next page

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Project Directorate II  
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Enclosures: 1. Amendment No. 273 to  
License No. DPR-79  
2. Safety Evaluation

cc w/enclosures

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TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-328

SEQUOYAH NUCLEAR PLANT, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 273  
License No. DPR-79

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Tennessee Valley Authority (the licensee) dated November 15, 2002, as supplemented by letters dated February 19, 2003 and February 26, 2003, 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, Operating License No. DPR-79 is amended as indicated in the attachment to this license amendment.
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 Operating License

Date of Issuance: March 26, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 273

FACILITY OPERATING LICENSE NO. DPR-79

DOCKET NO. 50-328

Replace the following page of Operating License No. DPR-79 with the attached revised page. The revised page is identified by amendment number and contains a vertical line indicating the area of change.

Remove Page

11

Insert Page

11

s. Primary Coolant Outside Containment (Section 22.2, III.D.1.1)

Prior to exceeding 5 percent power level, TVA is required to complete the leak tests on Unit 2, and results are to be submitted within 30 days from the completion of the testing.

(17) Surveillance Interval Extension

The performance interval for the 36-month surveillance requirements in TS 4.3.2.1.3 shall be extended to May 18, 1996, to coincide with the Cycle 7 refueling outage. The extended interval shall not exceed a total of 50 months for the 36-month surveillances.

(18) Mixed Core DNBR Penalty

TVA will obtain NRC approval prior to startup for any cycle's core that involves a reduction in the departure from nucleate boiling ratio initial transition core penalty below that value stated in TVA's submittal on Framatome fuel conversion dated April 6, 1997.

(19) Steam Generator Replacement Project

During the Unit 1 Cycle 12 refueling and steam generator replacement outage, lifts of heavy loads will be performed in accordance with Table 3.1 of NRC Safety Evaluation dated March 26, 2003.

- D. Exemptions from certain requirements of Appendices G and J to 10 CFR Part 50 are described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report, Supplements No. 1 and No. 5. These exemptions are authorized by law and will not endanger life or property or the common defence and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.

A temporary exemption from General Design Criterion 57 found in Appendix A to 10 CFR part 50 is described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report, Supplement No. 5, Section 6.2.4. This exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. The exemption, therefore, is hereby granted and shall remain in effect through the first refueling outage as discussed in Section 6.2.4 of Supplement 5 to the Safety Evaluation Report. The granting of the exemption is authorized with the issuance of the Facility Operating License. The facility will operate, to the extent authorized herein, in conformity with the application as amended, the provisions of the Act, and the regulations of the Commission. Additional Exemptions are listed in Attachment 2.

E. Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revision to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Safeguards Contingency Plan is incorporated into the Physical Security Plan. The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Sequoyah Physical Security Plan," with revisions submitted through November 23, 1987; and "Sequoyah Security Personnel Training and Qualification Plan," with revisions submitted through April 16, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 273 TO FACILITY OPERATING LICENSE NO. DPR-79

TENNESSEE VALLEY AUTHORITY  
SEQUOYAH NUCLEAR PLANT, UNIT 2

DOCKET NO. 50-328

## 1.0 INTRODUCTION

By application dated November 15, 2002, as supplemented by letters dated February 19, 2003 and February 26, 2003, Tennessee Valley Authority (TVA, the licensee) submitted a one-time license amendment request for Sequoyah Unit 2, (SQN2) operating license DPR-79. The one-time proposed condition for SQN2 would establish requirements for the safe operation of Unit 2, while heavy load lifts are performed during the Unit 1, Cycle 12, refueling and steam generator (SG) replacement outage. The movement of heavy loads over safety-related structures, systems and components (SSCs) creates a possibility for an accident of a different type than any previously evaluated in the Updated Final Safety Analysis Report (UFSAR).

The licensee proposed to modify the SQN2 operating license as follows:

### Steam Generator Replacement Project

During the Unit 1 Cycle 12 refueling and steam generator replacement outage, lifts of heavy loads will be performed in accordance Table 3.1 of NRC Safety Evaluation dated March 26, 2003.

Preceding this amendment request, the licensee, in a letter dated April 15, 2002, submitted plant-specific Topical Report 24370-TR-C-002, "Rigging and Heavy Load Handling" (the Topical), which provided the licensee's technical justification for moving heavy loads over safety-related SSCs during the Unit 1 outage and supports safe operation of both units. The technical issues associated with the Topical were reviewed and approved in a separate Nuclear Regulatory Commission (NRC) safety evaluation (SE) dated March 25, 2003.

## 2.0 REGULATORY EVALUATION

Both SQN units are pressurized water reactors (Westinghouse Ice Condenser design) that operate with an essential raw cooling water (ERCW) system that supplies cooling water to both units. Water is supplied to the auxiliary building station from the ERCW pumping station

through four independent sectionalized supply headers designated as 1A, 2A, 1B, and 2B. Four pumps are assigned to train A, and four to train B. The two headers associated with the same train (i.e., 1A/2A or 1B/2B) may be cross-tied to provide greater flexibility. The headers are arranged and fitted with isolation valves such that a rupture in any header can be isolated and will not jeopardize the safety functions of the other headers.

During the Unit 1, Cycle 12 refueling and SG replacement outage, a nonsingle failure proof commercial crane (i.e., outside lift system (OLS)) will be used to lift the old and replacement SGs through the top of the steel vessel and concrete shield building. If, during the handling of these heavy loads with the OLS, an inadvertent load drop occurred, this accident could potentially damage both trains of ERCW in Unit 1, and affect certain safety-related systems of Unit 2. The existing SQN UFSAR does not include an evaluation of the consequences of such a load drop. Therefore, the licensee is requesting a one-time change to SQN2, Operating License DPR-79 to provide reasonable assurance that Unit 2 may safely operate during the Unit 1 SG replacement project.

NRC Bulletin (NRCB) 96-02, "Movement of Heavy Loads over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment," dated April 1996, stated, in part, that licensees planning to perform activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled), and that involve a potential load drop accident that has not been evaluated in the UFSAR, must submit a license amendment request in advance of the planned movement of the loads so as to afford the staff sufficient time to perform an appropriate review.

NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants," dated July 1980, provides regulatory guidelines in two phases (Phase I and II) for licensees to assure safe handling of heavy loads in areas where a load drop could impact on stored spent fuel, fuel in the reactor core, or equipment that may be required to achieve safe shutdown (SSD) or permit continued decay heat removal. Phase I guidelines address measures for reducing the likelihood of dropping heavy loads and provide criteria for establishing safe load paths, procedures for load handling operations, training of crane operators, design, testing, inspection, and maintenance of cranes and lifting devices, and analyses of the impact of heavy load drops. Phase II guidelines address alternatives for mitigating the consequences of heavy load drops, including using either (1) a single-failure-proof crane for increased handling system reliability, or (2) electrical interlocks and mechanical stops for restricting crane travel, or (3) load drops and consequence analyses for assessing the impact of dropped loads on plant safety and operations. NUREG-0612, Appendix C provides alternative means of upgrading the reliability of the crane to satisfy the requirements of NUREG-0554, "Single Failure Proof Cranes for Nuclear Power Plants."

Generic Letter (GL) 85-11, "Completion of Phase II of Control of Heavy Loads at Nuclear Power Plants, NUREG-0612," dated June 28, 1985, dismissed the need for licensees to implement the guidelines of NUREG-0612, Phase II, based on the improvements obtained from the implementation of NUREG-0612, Phase I. GL 85-11, however, encouraged licensees to implement actions they perceive to be appropriate to provide adequate safety.

The proposed license amendment was not risk-informed; it was based on deterministic analysis. Regulatory Issue Summary (RIS) 2001-02 provides guidelines to the NRC staff for determining whether risk impact should be considered during the review of a non-risk-informed license amendment request. Based on the criteria in RIS 2001-02, the NRC staff determined it was appropriate to consider risk implications during its review of the license amendment request, because, if an inadvertent load drop occurred during the Unit 1 steam generator



replacement outage, it could degrade multiple levels of defense or result in a situation not explicitly considered in the development of the regulations. Therefore, as part of its review, the NRC staff conducted independent risk evaluations consistent with the risk-acceptance guidelines provided in Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

### 3.0 TECHNICAL EVALUATION

#### 3.1 Heavy Loads

The licensee, in its November 15, 2002, request, states that compensatory measures establish the SSD capability for Unit 2 in the event of a load drop that affects the ERCW system. The staff reviewed the compensatory measures and evaluated (1) the timing of TVA's actions and the effects on Unit 1/Unit 2 operations, (2) how the Train 1A/1B and Train A discharge could be isolated to protect Unit 2 while it continued to operate, (3) the length of time it would take to restore the indirect SSD equipment shared between Units 1 and 2 following a load drop on the ERCW system, and (4) the principal attributes of the plant procedures in the unlikely event of a load drop and when training on this new procedure would be completed.

The licensee described how the regulatory commitments would ensure continued safe operations of Unit 2 in the unlikely event of a load drop. As stated by the licensee, the zone where the potential for damage to the ERCW supply and return headers exists is the load path between the reactor building openings and the upending/downending area for the SGs starting at approximately 7 feet from the inside of the parapet wall until the upending/downending area is reached. If a load drop occurs in this zone, the licensee stated that it will immediately commence an orderly shutdown of Unit 2. In addition, the licensee performed a hydraulic analysis, TVA calculation MDQ00006720000095, of the ERCW system. The analysis showed that all direct Unit 2 SSD systems should receive the design ERCW flow rates and should be able to continue to perform their function indefinitely with no operator action.

The NRC staff, in an SE dated March 25, 2003, found the licensee's proposed commitments and compensatory measures to mitigate the effects of a postulated SG drop onto the safety-related ERCW system to be adequate. The ERCW system provides support for continued operation of Unit 2, as well as for indirect SSD equipment between Unit 1 and Unit 2. The staff found these measures adequate to maintain operational safety at both units, and sufficient to restore the functions of the indirect SSD equipment that may be impacted.

The NRC staff reviewed the licensee commitments and found them acceptable because they specify the actions necessary to ensure the functionality of safety significant SSCs including the emergency diesel generators (EDGs) and ensure that ERCW would be available to supply the required cooling loads in the unlikely event of a load drop. Because of the importance to safety of the proper execution of the regulatory commitments with regards to preventing/mitigating a heavy load drop, the NRC staff is incorporating the regulatory commitments into the license as conditions. Consistent with the license condition, a complete list of the conditions is contained in Table 3.1 (Attachment). The regulatory commitments in Table 3.1 will be followed when making the heavy load lifts described in the Topical and will be proceduralized in the licensee's compensatory measures for the SG replacement.

The NRC staff finds acceptable the aforementioned regulatory commitments for movement of the heavy load in the vicinity of safety-related SSCs during the SQN refuel and SG outage, and the compensatory measures within the Topical. The movement of heavy loads over safety-related SSCs creates a possibility for an accident of a different type than any previously

evaluated in the UFSAR, which the licensee has adequately analyzed in accordance with NRCB96-02. The licensee will implement the regulatory commitments, listed in Table 3.1, to preclude and mitigate the potential hazards of a drop. Therefore, the staff finds the licensee's proposed one-time license condition to Operating License DPR-79, and the use of Topical Report 24370-TR-C-002 at SQN2 acceptable. In addition, the regulatory commitments and compensatory measures satisfy the guidelines of NUREG-0612 for the handling and control of heavy loads during the SG replacement project.

### 3.2 Risk Implications

From a risk perspective, the evaluation of an OLS heavy load drop involves either an SG drop due to a random failure of the OLS or a failure due to an external event (high winds, tornado or seismic). The staff review of the SQN Individual Plant Evaluation (IPE) noted that support system faults contributed nearly half of the total of core damage frequency (CDF), particularly the loss of train A of the component cooling water system (CCS). A loss of CCS is a major contributor to reactor coolant pump seal failure. Based on the IPE review, loss of CCS is present in about 79 percent of the sequences leading to core damage and is the largest contributor to core damage at 22 percent of CDF. The loss of CCS would result from the loss of the ERCW system.

The licensee stated that, should a load drop occur in an area where the potential for ERCW pipe damage exists, all of the ERCW loads that are direct Unit 2 SSD components will continue to receive the design ERCW flow rates without the need for any actions. SSCs that could be affected by a load drop are identified below;

- Emergency Diesel Generators
- Train 'A' Auxiliary Air Compressor
- Main Control Room Chillers
- Component Cooling system pump space coolers
- Electrical Board Room Chillers
- 'A' 6.9 kilovolts Shutdown Board Room Chiller
- Cooling to Auxiliary Building Gas Treatment System.

Of these, the licensee has included measures to align the EDGs to their alternate source from the control room following a heavy load drop. The licensee stated that of the remaining items, the main control room chillers are limiting at 18 hours. The licensee also stated that the remaining components that require actions to align alternate cooling water sources, can be realigned in the time available. In addition, the licensee has developed compensatory measures to be implemented prior to heavy load lifts. These compensatory measures include plant alignment changes that provide additional time for plant response to a postulated heavy load drop. The proposed compensatory measures, implemented prior to a heavy load lift, are designed such that items required to remain operable per the Technical Specifications are not affected.

A heavy load drop that impacts the ERCW system also has the potential to flood the SQN auxiliary building. To preclude flooding of the Auxiliary Building that may result from a heavy load drop, the licensee will install a wall in the ERCW tunnel. The wall has been designed to withstand the hydrostatic head and impact loads generated by flooding of the ERCW tunnel. Based on this, the risk evaluations do not include subsequent flooding of the Auxiliary Building due to heavy load impacts on the ERCW system.

To obtain risk insights, the NRC staff conducted independent evaluations of several scenarios, using the SQN standardized plant analysis risk model. The different evaluations considered random failures, seismic events, and tornados. Also, the evaluations considered the regulatory commitments listed in Table 3.1 and the compensatory measures described in the Topical. Based on those evaluations, the NRC staff finds that the licensee's proposed license amendment does not reveal an unforeseen hazard or substantially greater potential for a known hazard to occur based on the insignificant increase in core damage probability (CDP) for the duration of SG heavy load lift activities. The staff notes that the estimated CDPs are very small and should not significantly influence the overall results of the licensee's deterministic analysis.

#### 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

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (67 FR 75885). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 6.0 CONCLUSION

As discussed above, this amendment incorporates the regulatory commitments in Table 3.1 into the Facility Operating License No. DPR-79 for SQN2.

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.

Attachment: Table 3.1

Principal Contributors: Gregory Hatchett, NRR  
Clifford Douth, NRR

Dated: March 26, 2003

Table 3.1: Regulatory Commitments To Be Incorporated Into License Condition

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The following regulatory commitments will be followed when making the heavy load lifts described in Topical Report 24370-TR-C-002 and will be proceduralized in the licensee's compensatory measures for the Unit 1 steam generator replacement project.

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Prerequisite Actions to Heavy Load Movement

- (1) Install temporary pressure and flow gauges in selected locations of Unit 1 ERCW piping
- (2) Install a wall in the Unit 1 pipe tunnel to seal the tunnel from the Auxiliary Building. Develop criteria to quantify the amount of water behind the temporary pipe tunnel wall.
- (3) Realign the ERCW system to minimize operator actions in the event of a heavy load drop.
- (4) Isolate the high-pressure fire pump and the flood mode pump piping in the pipe tunnel to the Auxiliary Building.
- (5) Isolate systems shared with Unit 2 or verify that they are capable of being isolated following a load drop, prior to handling a load over the Containment with the outside lift system.
- (6) Ensure that measures are in place to suitably handle any leakage through the temporary Unit 1 pipe tunnel wall
- (7) Provide earth fill, crane mat, or timber mat protection in the potentially affected areas above the ERCW ductbanks.

Active Monitoring Actions During Heavy Load Movement

- (8) Monitor weather conditions, for the expected duration of the lift, to ensure conditions are acceptable for outside lift system operation.
- (9) If weather conditions exceed operational limits of outside lift system and heavy loads are in the vicinity of safety-related structures, systems and components that are required to be operable, then take actions to terminate heavy load operation and place loads in a safe condition.
- (10) Monitor outside lift system operation to ensure a minimum clearance of 20 feet exists between the Shield Building dome and the steam generator when a steam generator is being moved over the Shield Building.

Actions in Response to the Unlikely Event of Heavy Load Drop

- (11) In the event of any load drop in the zone where the potential for piping damage exists, TVA will commence an orderly shutdown of Unit 2 and

Table 3.1: Regulatory Commitments To Be Incorporated Into License Condition

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assess the operability of safety-related structures, systems and components.

- (12) In the event of a load drop in the zone where the potential for piping damage exists, the four alternate supply valves for the standby emergency diesel generator will be opened immediately to preclude damage to the diesel generators if a start signal is generated due to some reason unrelated to the load drop.
- (13) In the event of a load drop in the zone where the potential for piping damage exists, an immediate operator action is to ensure that there are at least two running ERCW pumps per train.

Mr. J. A. Scalice  
Tennessee Valley Authority

SEQUOYAH NUCLEAR PLANT

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