



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37384-2000

March 5, 2004

TVA-SQN-TS-04-02

10 CFR 50.90

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555-0001

Gentlemen:

In the Matter of ) Docket Nos. 50-327  
Tennessee Valley Authority ) 50-328

**SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - TECHNICAL SPECIFICATIONS (TS) CHANGE 04-02, "APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO EXTEND THE INSPECTION INTERVAL FOR REACTOR COOLANT PUMP FLYWHEELS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP)"**

Pursuant to 10 CFR 50.90, Tennessee Valley Authority (TVA) is submitting a request for a TS change (TS 04-02) to Licenses DPR-77 and DPR-79 for SQN Units 1 and 2.

The proposed amendment will extend the reactor coolant pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval, to an interval not to exceed 20 years. The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this TS improvement was announced in the Federal Register on June 24, 2003, as part of the consolidated line item improvement process (CLIIP).

Enclosure 1 provides a description of the proposed change and the requested confirmation of applicability. Enclosure 2 provides the existing TS pages marked-up to show the proposed change.

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TVA requests approval of the proposed License Amendment by September 10, 2004, to support the SQN Unit 1 Cycle 13 refueling outage, with the amendment being implemented within 45 days.

If you have any questions about this change, please contact me at 843-7170 or Jim Smith at 843-6672.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 5 day of March, 2004.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pedro Salas', is written over a large, loopy scribble that also contains some illegible markings.

Pedro Salas  
Licensing and Industry Affairs Manager

Enclosures:

1. TVA Evaluation of the Proposed Changes
2. Proposed Technical Specifications Changes (mark-up)

cc: See page 3

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Enclosures

cc (Enclosures):

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## ENCLOSURE 1

### TENNESSEE VALLEY AUTHORITY (TVA) SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2

#### Description and Assessment

#### 1.0 INTRODUCTION

The proposed License Amendment changes Technical Specification (TS) 4.0.5.c. The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this TS improvement was announced in the Federal Register on June 24, 2003 as part of the consolidated line item improvement process (CLIIP).

#### 2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved TSTF-421, the proposed TS change includes the following revision to TS 4.0.5.c:

The examination interval for the RCP flywheels is changed from approximately 10-year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI to 20-year intervals.

The current requirements for RCP flywheel inspections include a SR 4.0.2 applicability provision that is not consistent with the approved TSTF-421. SR 4.0.2 allows for surveillance performance interval extensions of up to 25 percent of the specified surveillance interval. Therefore, a clarifying parenthetical has been added to indicate that the provisions of SR 4.0.2 are not applicable to be consistent with TSTF-421 and the associated WCAP-15666.

#### 3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on October 22, 2003 (68 FR 60422), NRC Notice for Comment published on June 24, 2003 (68 FR 37590), TSTF-421, WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination," and the related NRC safety evaluation (SE) dated May 5, 2003.

#### 4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by

the NRC Notice of Availability published on October 22, 2003 (68 FR 60422), NRC Notice for Comment published on June 24, 2003 (68 FR 37590), TSTF-421, WCAP-15666, and the related NRC SE.

## **5.0 TECHNICAL ANALYSIS**

TVA has reviewed the model SE published on June 24, 2003 (68 FR 37590), and verified its applicability as part of the CLIIP. This verification included a review of the NRC staff's model SE, as well as the information provided to support TSTF-421 (including WCAP-15666 and the related SE dated May 5, 2003). TVA has concluded that the justifications presented in the TSTF proposal and the model SE prepared by the NRC staff are applicable to SQN Units 1 and 2 and justify this amendment for the incorporation of the changes to the SQN TS. The SR 4.0.2 parenthetical addition is more restrictive than current requirements and provides consistency with TSTF-421, NRC staff's model SE, and WCAP-15666 with related SE.

## **6.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC notices related to the CLIIP, TSTF-421, topical report WCAP-15666, and the associated SE.

## **7.0 NO SIGNIFICANT HAZARDS CONSIDERATION**

TVA has reviewed the proposed no significant hazards consideration determination published on June 24, 2003 (68 FR 37590), as part of the CLIIP. TVA has concluded that the proposed determination presented in the notice is applicable to SQN, and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## **8.0 ENVIRONMENTAL EVALUATION**

TVA has reviewed the environmental evaluation included in the model SE published on June 24, 2003 (68 FR 37590), as part of the CLIIP. TVA has concluded that the staff's findings presented in that evaluation are applicable to SQN and the evaluation is hereby incorporated by reference for this application.

## **9.0 PRECEDENT**

This application is being made in accordance with the CLIIP. TVA is not proposing variations or deviations from the TS changes described in TSTF-421 or the NRC staff's model SE published on June 24, 2003 (68 FR 37590).

## 10.0 REFERENCES

1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published October 22, 2003, (68 FR 60422).
2. Federal Register Notice: Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published June 24, 2003 (68 FR 37590).
3. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-156March 5, 200466)," Revision 0, November 2001.
4. WCAP-15666-A, "Extension of Reactor Coolant Pump Motor Flywheel Examination," October 2003.
5. NRC letter dated May 5, 2003, from H. Berkow to R. Bryan (WOG) transmitting Safety Evaluation of WCAP-15666.

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY  
SEQUOYAH NUCLEAR PLANT (SQN)  
UNITS 1 AND 2

Proposed Technical Specification Changes (mark-up)

I. AFFECTED PAGE LIST

Unit 1

3/4 0-2

Unit 2

3/4 0-2

II. MARKED PAGES

See attached.

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual Limiting Condition for Operation, unless otherwise stated in the individual Surveillance Requirement. Failure to meet a Surveillance Requirement, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified surveillance interval shall be failure to meet the Limiting Conditions for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval (including the allowed extension per Specification 4.0.2), then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(s) must be entered. When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the specified surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be as follows:

#### Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 4.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inspection of each reactor coolant pump flywheel per the recommendation of Regulation Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975 or in lieu of Position c.4.b(1) and c.4.b(2), a qualified in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the removed flywheels may be conducted at approximately 10-year intervals coinciding with the inservice inspection schedule as required by ASME Section XI; and  

(the provisions of SR 4.0.2 are not applicable)
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirement of any TS.

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## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual Limiting Condition for Operation, unless otherwise stated in the individual Surveillance Requirement. Failure to meet a Surveillance Requirement, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified surveillance interval shall be failure to meet the Limiting Conditions for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

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This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 4.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inspection of each reactor coolant pump flywheel per the recommendation of Regulation Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975 or in lieu of Position c.4.b(1) and c.4.b(2), a qualified in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the removed flywheels may be conducted at approximately 10-year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI; and  

**(the provisions of SR 4.0.2 are not applicable)**
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirement of any TS.

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