



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

November 4, 2004

TVA-SQN-TS-00-14

10 CFR 50.90

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

Gentlemen:

In the Matter of) Docket No. 50-327
Tennessee Valley Authority)

**SEQUOYAH NUCLEAR PLANT (SQN) - UNIT 1 - LICENSE AMENDMENT
REQUEST, EXTENSION OF IMPLEMENTATION PERIOD FOR LICENSE
AMENDMENT 294 (TECHNICAL SPECIFICATION [TS] CHANGE 00-14)**

In accordance with the provisions of 10 CFR 50.90, TVA is submitting an emergency request for a license amendment to SQN's License DPR-77 to extend the implementation period for TS Change 00-14 (License Amendment 294 for SQN Unit 1). The basis for these determinations, information supporting the change, a no significant hazards consideration, and an environmental consideration are included.

Enclosure 1 provides a "No Significant Hazards Evaluation" and the technical basis for this requested change. The emergency nature and why it could not have been avoided are also addressed in Enclosure 2 pursuant to 10 CFR 50.91(a)(5).

The need for the proposed change is based on unforeseen difficulties associated with the calibration of the low-temperature overpressure protection (LTOP) system setpoints. As discussed with NRC staff on November 4, 2004, an emergency TS change is needed to prevent a delay in the resumption of operation.

A001

U.S. Nuclear Regulatory Commission
Page 2
November 4, 2004

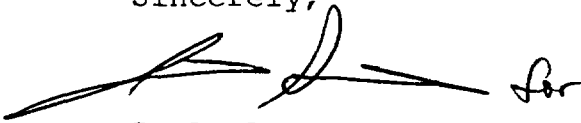
The May 15, 2005 date is based on review of the current effective full power years that remain for the SQN Unit 1 reactor coolant system pressure-temperature limits and LTOP setpoints.

TVA requests NRC approval of the subject extension prior to completion of the SQN Unit 1 Cycle 13 refueling outage. Generator synchronization is currently scheduled for November 15, 2004.

There are no commitments in this letter. If you have any questions about this change, please telephone me at (423) 843-7170 or J. D. Smith at (423) 843-6672.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 4th day of November, 2004.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. L. Pace', with a stylized flourish at the end.

P. L. Pace
Manager, Site Licensing
and Industry Affairs

Enclosures:

TVA Evaluation of the Proposed Changes

U.S. Nuclear Regulatory Commission
Page 3
November 4, 2004

JDS:DVG:PMB

Enclosures

cc (Enclosures):

Framatome ANP, Inc.
P. O. Box 10935
Lynchburg, Virginia 24506-0935
ATTN: Mr. Frank Masseth

Mr. Robert J. Pascarelli, Senior Project Manager
U.S. Nuclear Regulatory Commission
Mail Stop O-7A15
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2739

Mr. Lawrence E. Nanney, Director
Division of Radiological Health
Third Floor
L&C Annex
401 Church Street
Nashville, Tennessee 37243-1532

ENCLOSURE 1

**TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT (SQN)
UNIT 1
DOCKET NO. 327**

**PROPOSED LICENSE AMENDMENT FOR EXTENDING
IMPLEMENTATION OF TECHNICAL SPECIFICATION (TS) CHANGE 00-14**

1.0. DESCRIPTION

TVA is requesting an amendment to Operating License DPR-77 for SQN Unit 1.

TVA proposes to extend the implementation period associated with TS Change 00-14 (Amendment 294) until May 15, 2005.

By letter dated September 15, 2004, NRC issued License Amendment Nos. 294 and 284 for SQN Units 1 and 2, respectively. The amendments revised the TS reactor coolant system (RCS) pressure-temperature limits and the low-temperature overpressure protection (LTOP) setpoints for each unit. These amendments were requested by TVA letter dated September 6, 2002. The amendments were effective as of the date of issuance and were to be implemented prior to completion of the Cycle 13 refueling outages for each unit.

Due to unforeseen difficulties associated with calibration of the electronic modules that control the LTOP system setpoints, TVA requests a delay in implementation of TS Change 00-14 until May 15, 2005.

2.0 PROPOSED CHANGE

By letter dated September 15, 2004, NRC issued License Amendment Nos. 294 and 284 for SQN TS Change 00-14 (Units 1 and 2, respectively). The amendments revised the TS RCS pressure-temperature limits and the LTOP setpoints for each unit. These amendments were requested by TVA letter dated September 6, 2002. The implementation period for each amendment states:

This license amendment is effective as of its date of issuance, to be implemented by the completion of the 2004 Sequoyah Unit 1 Cycle 13 Refueling Outage.

TVA requests that implementation requirements of SQN Unit 1 Amendment 294 be amended as follows:

This license amendment is effective as of its date of issuance, to be implemented by May 15, 2005.

3.0 BACKGROUND

TVA has encountered unforeseen difficulties associated with calibration of the electronic modules that control the new Unit 1 LTOP system setpoints as provided in TS Change 00-14. In addition, TVA discovered that a spare module would not calibrate to the new LTOP setpoints and must be shipped back to the vendor for refurbishment. Refurbishment of the spare module will not be available from the vendor in time to support TVA's schedule for startup from the Unit 1 Cycle 13 refueling outage. In addition, implementation of the LTOP setpoints is not required during an outage.

4.0 TECHNICAL ANALYSIS

TVA has confirmed that implementation of TS Change 00-14 is not required during an outage. Accordingly, the request for extending implementation is not a technical issue. The proposed change is purely an administrative change.

5.0 REGULATORY SAFETY ANALYSIS

NRC approval to incorporate revised reactor coolant system (RCS) pressure and temperature limits and revised low-temperature overpressure protection (LTOP) system setpoints is documented in the NRC Safety Evaluation Report for License Amendment Nos. 294 and 284 (SQN Units 1 and 2, respectively). These amendments are not yet implemented by TVA. The proposed emergency license amendment extends the implementation period for SQN Unit 1 until May 15, 2005.

5.1 No Significant Hazards Consideration

TVA has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. **Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No.

The proposed emergency license amendment extends the implementation period specified in License Amendment 294. The extension will allow TVA to complete the necessary refurbishment of control modules for the LTOP system prior to implementation. The proposed amendment is purely administrative and has no technical or safety

aspects. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No.

The proposed emergency license amendment extends the implementation period specified in SQN Unit 1 License Amendment 294. The extension will allow TVA to complete the necessary refurbishment of control modules for the Unit 1 LTOP system prior to implementation. The proposed amendment is purely administrative and has no technical or safety aspects. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. **Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The proposed emergency license amendment extends the implementation period specified in SQN Unit 1 License Amendment 294. The extension will allow TVA to complete the necessary refurbishment of control modules for the Unit 1 LTOP system prior to implementation. The proposed amendment is purely administrative and has no technical or safety aspects. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, TVA concludes that the proposed amendment(s) present no significant hazards consideration under the standards set forth in 10 CFR 50.92 (c), and accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

In conclusion, based on the considerations discussed above, (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.

6.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 50.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

7.0 REFERENCES

1. NRC letter to TVA dated September 14, 2004, "Sequoyah Nuclear Plant, Units 1 and 2 - Issuance of Amendment Regarding Technical Specification Change No. 0014, Pressure Temperature Limits Report" (TAC Nos. MB6436 and MB6437)
2. TVA letter to NRC dated September 6, 2002, "Sequoyah Nuclear Plant (SQN) - Units 1 And 2 - Technical Specification (TS) Change No. 00-14, 'Pressure Temperature Limits Report (PTLR) and Request for Exemption From The Requirements of 10 CFR 50, Appendix G'"

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT (SQN)
UNIT 1
DOCKET NO. 327

**PROPOSED LICENSE AMENDMENT FOR EXTENDING
IMPLEMENTATION OF TECHNICAL SPECIFICATION (TS) CHANGE 00-14**

By letter dated September 6, 2002, TVA requested a license amendment (TS Change 00-14) to implement new updated reactor coolant system pressure-temperature limits and low-temperature overpressure protection (LTOP) setpoints for each unit. Implementation involved calibration of the LTOP instrumentation. TVA's preferred schedule for performing the calibration of the LTOP setpoint instrumentation was to stage this work during plant shutdown for each unit. The Unit 1 Cycle 13 refueling outage provided the first opportunity for performing this calibration following NRC approval of the new limits. Accordingly, during the Unit 1 Cycle 13 refueling outage, the LTOP system calibration activities were started. TVA encountered unforeseen difficulties associated with calibration of the electronic LTOP modules. These difficulties substantially extended the schedule in the outage to calibrate one module. TVA also discovered that a spare module would not calibrate to the new LTOP setpoints and had to be shipped back to the vendor for refurbishment. A refurbished spare module will not be available from the vendor in time to support TVA's schedule for startup from the Unit 1 Cycle 13 refueling outage and these modules are not readily available from other sources. Based on the hardships encountered with the calibration of one of two required modules, the time estimate to complete the calibration from our current condition would extend the time to resumption of full power. Further, the second required module may not be capable of calibration to the new LTOP setpoints. Accordingly, TVA was not able to avoid the hardships associated with implementation of SQN Unit 1 TS Change 00-14.