

March 24, 2008

Mr. William R. Campbell, Jr.
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 TECHNICAL SPECIFICATION CHANGE 06-06 REVISED STEAM
GENERATOR VOLTAGE-BASED REPAIR CRITERIA PROBABILITY OF PRIOR
CYCLE DETECTION (TAC NO. MD4110)

Dear Mr. Campbell:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 309 to Facility Operating License No. DPR-79 for the Sequoyah Nuclear Plant Unit 2 (SQN 2). The amendment consists of changes to the Technical Specifications (TSs) in response to your application date January 12, 2007, as supplemented by letters dated January 8, 2008, and February 8, 2008.

The amendment revises the steam generator voltage-based repair criteria probability of detection (POD) method. The method would be incorporated into the SQN 2 TS Bases. In addition, a reporting requirement would be added to the TSs. The proposed POD method is based on the probability of prior cycle detection method, and it is used in assessing steam generator tube integrity. The proposed POD method is an alternative approach to the guidance of Generic Letter 95-05, "Voltage-Based Repair Criteria for Westinghouse Steam Generator Tubes Affected by Outside Diameter Stress Corrosion Cracking," dated August 3, 1995, and its use requires prior Commission review and approval.

A copy of the related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Brenda L. Mozafari, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-328

Enclosures: 1. Amendment No. 309 to DPR-79
2. Safety Evaluation

cc w/enclosures: See next page

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ADAMS Accession Number: Ltr: ML080710518 Pkg: ML080710575 TS: ML080710577 NRR-106

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| NAME | AObodoako | BMozafari | RSola | AHiser By memo dated | CChandler | TBoyce |
| DATE | 03/20/08 | 03/21/08 | 03/20/08 | 2/17/08 | 3/17/08 | 03/24/08 |

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TENNESSEE VALLEY AUTHORITY
DOCKET NO. 50-328
SEQUOYAH NUCLEAR PLANT, UNIT 2
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 309
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 January 12, 2007, as supplemented by letters dated January 8, 2008, and February 8, 2008, 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 Title 10 of the *Code of Federal Regulations* (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. 309, 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 60 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Thomas H. Boyce, Chief
Plant Licensing Branch II-2
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to License No. DPR-79 and
the Technical Specifications

Date of Issuance: March 24, 2008

ATTACHMENT TO LICENSE AMENDMENT NO. 309

FACILITY OPERATING LICENSE NO. DPR-79

DOCKET NO. 50-328

Replace page 3 of License No. DRP-79 with the attached revised page 3.

Replace the following page of the Appendix A Technical Specifications with the attached page. The revised page is identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

6-15

INSERT

6-15

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 309 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 January 12, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML070250031), Tennessee Valley Authority (TVA), the licensee for Sequoyah Nuclear Plant, Unit 2 (SQN 2), submitted a license amendment request to implement a revised steam generator (SG) voltage-based repair criteria probability of detection (POD) method. Additional information supporting the request was provided in letters dated January 8, 2008, (ADAMS Accession No. ML080100595) and February 8, 2008, (ADAMS Accession No. ML080600372). The revised method would be incorporated into the SQN 2 Technical Specification (TS) Bases. In addition, a reporting requirement would be added to the TSs.

The proposed POD method is based on the probability of prior cycle detection (POPCD) method, and it is used in assessing SG tube integrity. The proposed POD method is an alternative approach to the guidance of Generic Letter (GL) 95-05, "Voltage-Based Repair Criteria for Westinghouse Steam Generator Tubes Affected by Outside Diameter Stress Corrosion Cracking," dated August 3, 1995, and its use requires prior U.S. Nuclear Regulatory Commission (NRC, Commission) review and approval.

GL 95-05 specifies that a POD of 0.6 is to be applied to all bobbin indications. The use of the constant POD of 0.6 for determination of the beginning of cycle (BOC) voltage distribution can be non-conservative for indications below approximately 0.5 volts and conservative for indications above 1 volt. The POPCD method provides a more realistic POD which is a function of the indication's voltage.

The January 8, 2008, and February 8, 2008, supplemental letters provided additional clarifying information, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination published in the *Federal Register*.

A similar license amendment request was approved for Diablo Canyon Units 1 and 2 by letter dated October 28, 2004 (ADAMS Accession No. ML043140456).

2.0 REGULATORY EVALUATION

The licensee implements a voltage-based alternate repair criteria (ARC) for axial outside diameter stress corrosion cracking (ODSCC) located at tube-to-tube support plate intersections. The voltage-based repair criteria for axial ODSCC at the tube support plate elevations are discussed in GL 95-05. The NRC previously reviewed and approved the use of this ARC at SQN 2 through a license amendment modifying the SQN 2 TSs. At that time, the licensee updated the SQN 2 TS Bases to describe implementation of the GL 95-05 voltage-based repair criteria.

Implementation of the voltage-based repair criteria requires analyses to demonstrate that tubes remaining in service under this ARC will retain adequate structural and leakage integrity during normal operating, transient, and postulated accident conditions, consistent with General Design Criteria 14, 15, 30, 31, and 32 of Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix A. Structural integrity refers to maintaining adequate margins against gross failure, rupture, and collapse of the SG tubing. Leakage integrity refers to limiting primary-to-secondary leakage to within acceptable limits (e.g., 10 CFR Part 100).

GL 95-05 specifies the methodology to be used for ensuring structural integrity (e.g., determination of the conditional burst probability) and for ensuring leakage integrity (e.g., determination of the total primary-to-secondary leak rate during postulated accident conditions (e.g., main steam line break)). These methodologies rely, in part, on projecting the voltage distribution of indications expected at the end-of-cycle (EOC) (i.e., the EOC voltage distribution). The EOC voltage distribution is calculated from the BOC voltage distribution, the POD, the growth rate distribution, and the measurement (i.e., non-destructive examination) uncertainty distributions. Currently, a POD of 0.6 is used at SQN 2 for all BOC indications, as discussed in GL 95-05. Since a change to the POD results in a departure from a method of evaluation described in GL 95-05, this change requires a license amendment request.

Given that the NRC previously approved the voltage-based ARC (on a permanent basis) for SQN 2 and the use of POPCD at another licensee (Diablo Canyon), the staff's review focused on whether the request differed from what was previously approved, and whether the proposed changes in the POD methodology would result in a sufficiently conservative projection of the EOC voltage distribution and that prompt corrective actions would be taken when the results were not sufficiently conservative.

3.0 TECHNICAL EVALUATION

3.1 Background

Use of the voltage-based ARC requires certain actions to be performed (e.g., inspections, repairs, and analysis). Based on the inspection results of each SG, an analysis is performed for those indications/locations that are addressed by the ARC to ensure the projected EOC conditional burst probability during postulated accidents (e.g., steam line break) remains below the acceptance limit of 1×10^{-2} . In addition, an analysis is performed to ensure the accident induced primary-to-secondary leak rate (from all sources) will not exceed the acceptance criteria of TS 6.8.4.k.b.2.

These analyses use Monte Carlo statistical analysis techniques to project the EOC voltage distribution. The projected EOC voltage distribution is determined from the BOC voltage distribution, the POD, a growth rate distribution, and a non-destructive examination uncertainty distribution. The projected EOC voltage distribution is then used in conjunction with empirically derived correlations between the voltage (i.e., bobbin coil voltage) and tube burst pressure and leak rate to evaluate whether the acceptance criteria are met.

The BOC voltage distribution is based on consideration of all bobbin indications identified during that outage. A POD of 0.6 is used for all BOC indications as stated in GL 95-05. The POD values are used, in part, to account for missed indications (i.e., present, but not detected) and new indications that may initiate during the next operating cycle.

The proposed POD method is based, in part, on the POPCD method described in the Electric Power Research Institute Topical Report NP 7480-L, Addendum 6, "Steam Generator Tubing Outside Diameter Stress Corrosion Cracking at Tube Support Plates Database for Alternate Repair Limits," dated January 2005, which was submitted to the NRC in a letter from NEI dated February 04, 2005 (ADAMS Accession No. ML050460014).

3.2 POPCD Definition and Treatment of Inspection Data

Bobbin probe inspection of the SG tubes is required to be performed every refueling outage. Additional inspections of the SG tubes at tube-to-tube support plate intersections are performed with a rotating probe. The term rotating probe or rotating pancake coil (RPC) is used in this document to mean a rotating probe equipped with a pancake coil or other equivalent coil such as the +Point™ coil. The results of these inspections are used in the development of the POPCD. POPCD is calculated as the ratio of indications reported at the prior inspection, cycle n , to the total indications found at the subsequent inspection, cycle $n+1$ (i.e., all indications reported in the prior cycle plus new indications).

The definition of POPCD is based on the premise that all bobbin indications that can contribute significantly to burst and leakage during the next operating cycle can be confirmed (i.e., detected) by rotating probe inspections. For the purposes of POPCD, RPC inspection results are assumed to be "truth." That is, an indication detected via an RPC inspection is assumed to mean a flaw is present, regardless of the results of the inspection with a bobbin probe. Conversely, the absence of an RPC indication (at a location where there is a bobbin indication) is assumed to mean that no flaw is present that can contribute significantly to burst or leakage during the next operating cycle. POPCD treats all newly identified bobbin and RPC indications at an inspection as having been undetected at the prior inspection. All of these "new" indications are included in the POPCD calculations, even though some of them may have initiated during the operating cycle. Therefore, the application of POPCD attempts to account for newly initiated indications, as well as previously undetected indications.

Tables 1 and 4 of the January 12, 2007 letter, as clarified in a letter dated January 8, 2008, describe how the inspection results (e.g., detected with bobbin, not detected with bobbin, detected with RPC, etc.) are used in determining the POPCD. The submittal also discusses that a plant-specific POPCD is to be used rather than an industry generic POPCD. The use of a plant-specific POPCD (when appropriately justified) removes a concern that the noise levels at the plant may be higher than that at the other plants used to construct the generic industry POPCD model such that the use of the generic POPCD model is non-conservative. The use of

an industry generic POPCD may be appropriate if there is insufficient plant-specific data to justify the use of a plant-specific POPCD. SQN 2 has sufficient plant-specific data to justify the use of a plant-specific POPCD with one exception. The SQN 2 POPCD database does not have a sufficient number of indications in the upper voltage range. Although SQN 2 does not have a sufficient number of indications in the upper voltage range, the NRC staff concluded that it was acceptable to use the plant-specific POPCD since the SQN 2 POPCD distribution is very similar to the generic industry POPCD distribution, it is expected that SQN 2 will have an adequate number of higher voltage data points in the near term, and an assessment on the adequacy of the methodology will be performed after every outage and corrective actions will be implemented in the event that the methodology is significantly non-conservative.

Table 1 of the January 12, 2007 letter states that indications that were confirmed (i.e., detected) with an RPC probe during EOC_n will be inspected with an RPC probe during the EOC_{n+1} inspection even if the indication is not detected with the bobbin probe during EOC_{n+1} . For the purposes of POPCD, RPC inspection results are considered "truth" and, therefore, RPC confirmation of the indication during EOC_n indicates that a flaw is present at that location. If the indication is not detected with a bobbin probe during the EOC_{n+1} inspection, this would imply a potentially inaccurate bobbin probe inspection result. Therefore, an RPC probe inspection will be performed during EOC_{n+1} to ensure that all known ODSCC indications are included in the GL 95-05 calculations.

Indications that were confirmed (i.e., detected) with an RPC probe during EOC_n that are inspected, but not detected with an RPC probe during EOC_{n+1} could appear to be "disappearing flaws" since RPC inspection results are considered "truth." Therefore, Table 1 indicates that the causative factors for this change in RPC detection will be discussed in the ARC 90-day report for all indications with a +Point™ voltage greater than 0.5 volts. In addition, regardless of whether the +Point™ voltage exceeds 0.5 volts, if there are a significant number of these types of indications (i.e., no longer detectable with an RPC probe), then the cause will also be discussed in the 90-day report.

For the POPCD evaluation, all determinations of bobbin and RPC "detection" at EOC_n and voltages assigned to EOC_n detected indications are to be based exclusively on the inspection records from the EOC_n inspection. Lookback analyses of the EOC_n data are only applied to assign EOC_n voltages for new indications detected at EOC_{n+1} (i.e., EOC_n voltages are not available from the inspection records). If the indication cannot be assigned a voltage at the EOC_n inspection based on a lookback analysis, the licensee will estimate the EOC_n voltage by reducing the EOC_{n+1} voltage by the average voltage growth for the cycle.

When EOC_{n+1} indications are only found by RPC inspection (i.e., no degradation was identified in the bobbin mix channel), the EOC_{n+1} bobbin voltage for this indication is determined based on a review of the 200 kHz bobbin data. If a flaw is not evident in the 200 kHz data, a correlation relating RPC voltage to bobbin voltage is used to determine the bobbin voltage. However, if there is more than one ODSCC indication at the intersection, the bobbin voltage assigned to the intersection is estimated as the square root of the sum of squares of the bobbin voltages (the bobbin voltages are determined from the RPC voltage to bobbin correlation for each indication). Given the scatter in the correlations which are used to assign voltages to indications not detected with the bobbin coil, the licensee committed to assess whether the bobbin voltages assigned to these indications continue to remain conservative. That is, once these indications

become detectable by bobbin, a review of the prior cycle assigned voltages, the current cycle actual bobbin voltages, and the growth rate will be performed.

3.3 Statistical Generalized Linear Model (GLM) Regression Analyses

The POPCD data (i.e., voltage bin versus POPCD value for each voltage bin) are utilized in a statistical GLM regression analyses to develop a POPCD cumulative distribution function. The data from this table are sorted into 0.1-volt bins representing various voltage levels (e.g., 0.21 to 0.3 volts) and the POPCD distributions are developed using fits to weighted binary data, where weighting is based on the number of indications in each bin. Monte Carlo techniques are then used to apply the POPCD curves to the distribution of indications found during the outage to develop the BOC voltage distribution. The Monte Carlo techniques include simulation of the uncertainties in the POPCD distribution as discussed in the February 8, 2008 letter.

The p-value for the POPCD regression is the probability of observing a value of χ^2 as small as the one calculated from the data. A high p-value (i.e., greater than 5 percent) may indicate that noise is interfering with the reliable detection of indications. As a result, if the p-value for the POPCD regression analysis is greater than 5 percent, an alternate POD model will be submitted to the NRC for approval. If this were to happen, a default value of 0.6 for POD would be used until an alternate model was approved. It is not expected that the p-value for the plant-specific POPCD would exceed 5 percent.

3.4 Other Considerations and Benchmarking

The POD model in GL 95-05 (along with the other models discussed above) was intended to ensure the projection of the EOC voltage distribution was conservative or that corrective actions were taken prior to exceeding the acceptance limit for the probability of burst and acceptance limits for primary-to-secondary leakage during postulated accident conditions. A conservative projection of the EOC voltage distribution would provide confidence that the probability of burst and the projected leakage under postulated accident conditions were also conservative.

With the proposed relaxation to the constant POD model in GL 95-05, it is important that the growth rate model is sufficiently conservative. As part of the POPCD application, the steps for determining the flaw growth distribution used in the projection of the EOC voltage distribution were described. These steps are described in the January 8, 2008, letter. Essentially, these steps involve determining the cumulative probability distribution function of the growth rate, selecting the limiting growth rate distribution for each SG, analyzing for voltage dependent growth, analyzing for potentially increasing growth rates, and determining if any additional adjustments to the growth rate distributions are needed.

To ascertain whether the changes in the methodologies are appropriate, the POPCD methodology along with the growth methodology were used in combination with historic inspection results to determine whether the methodologies were conservative in projecting the burst probability and accident induced leakage. That is, the methodology was benchmarked using historic inspection results at SQN 2. This benchmarking was performed using a methodology similar to that which was proposed with some minor exceptions (e.g., the uncertainty in the POPCD distribution was evaluated at a lower 95-percent confidence level (i.e., a constant value for each voltage) rather than being modeled via a Monte Carlo approach, and a cycle length longer than the actual cycle length was used in the benchmarking analyses).

The results of the benchmarking analyses indicated that the methodology used to project the EOC conditions was not conservative in all cases; however, the underpredictions could be explained and, in general, were not significant.

There have been several instances throughout the industry where the change in the voltage of the indication was significantly underpredicted. To limit the potential for these extreme voltage changes, in its letter of January 12, 2007, TVA committed to perform a rotating probe inspection of all bobbin indications above 1.7 volts at tube-to-tube support plate intersections. If the rotating probe voltage exceeds 1.9 volts, TVA will repair the indication. In addition, in its letter of January 8, 2008, TVA committed to reviewing large bobbin voltage indications that are confirmed with a rotating probe to determine if they should be preventively repaired, even if these indications do not exceed the 1.9 volt rotating probe voltage threshold.

As discussed above, the proposed models used in projecting the EOC voltage distribution have, for the most part, resulted in conservative projections. However, given that they have not always been conservative, the licensee has proposed to modify their TSs to require an assessment of the adequacy of their methodology for projecting the EOC conditions under certain conditions. Specifically, the licensee has proposed to add the following requirement as TS 6.9.1.16.5:

For implementation of the POPCD method, for the voltage-based repair criteria at tube support plate intersections, if the end-of-cycle conditional tube rupture probability for a postulated main steam line break, the projected primary to secondary leak rate during a postulated main steam line break, or the number of indications are under predicted by the previous cycle operational assessment, the following shall be reported to the Commission within 90 days after initial entry into MODE 4 following completion of inspection performed in accordance with specification 6.8.4.k, "Steam Generator Program."

1. The assessment of the probable causes for the under prediction, proposed corrective actions, and any recommended changes to probability of detection or growth methodology indicated by potential methods assessments.
2. An assessment of the potential need to revise the alternate repair criteria analysis methods if: the burst probability is under predicted by more than 0.001 (i.e., 10 percent of the performance criteria) or an order of magnitude; or the leak rate is under predicted by more than 0.5 gallon per minute (gpm) or an order of magnitude.
3. An assessment of the potential need to increase the number of predicted low voltage indications at the beginning of cycle if the total number of as-found indications in any SG are underestimated by greater than 15 percent or by greater than 150 indications.

Upon implementation of POPCD, TVA also committed to including several additional items in the 90-day reports required by TS Section 6.9.1.16.5. These reporting requirements are listed, in part, in Section 7.0 of Enclosure 4 of TVA's January 12, 2007, letter. These commitments

basically include reporting the POPCD data, assessing the POPCD method for potential changes over time, and evaluating "disappearing" flaws.

3.5 Technical Evaluation Conclusion

Based on the information provided by the licensee (and summarized above), the staff concludes that the changes to the POD model and the associated TS changes are acceptable, since the changes in the methodology result in sufficiently conservative projections of the EOC voltage distribution and that prompt corrective actions will be taken when the results are not sufficiently conservative.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Tennessee State official, Mr. Bruce House of the Tennessee Bureau of Radiological Health, 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 and changes surveillance requirements. 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 (72 FR 11395). 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

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.

Principal Contributor: John Burke

Dated: March 24, 2008

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