Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

January 26, 2010

10 CFR 50.90

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

Sequoyah Nuclear Plant, Units 1 and 2
Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Subject: **Sequoyah Nuclear Plant - Technical Specifications (TS) Change 09-05- Intermediate Range, Neutron Flux Channel Operability Requirements Revision**

Pursuant to 10 CFR 50.90, Tennessee Valley Authority (TVA) is submitting a request for a Technical Specification (TS) change (TS 09-05) to Licenses DPR-77 and DPR-79 for Sequoyah Nuclear Plant (SQN) Units 1 and 2, respectively. The proposed TS change revises TS Table 3.3-1, "Reactor Trip System Instrumentation," Functional Unit 5, "Intermediate Range, Neutron Flux," to resolve an oversight regarding the operability requirements for the intermediate range neutron flux channels.

TS Table 3.3-1 does not provide an action that addresses the declaration of two intermediate range neutron flux channels inoperable in Mode 1 with power above 10 percent of thermal rated power, (i.e., the P-10 setpoint). As a result, Specification 3.0.3 would apply. This requirement is unnecessarily restrictive, because the intermediate range neutron flux channels do not provide a protection function above the P-10 setpoint. Above the P-10 setpoint, the power range neutron flux trip and the power range neutron flux high positive rate trip provide core protection for a rod withdrawal accident. To resolve this issue, TVA proposes to add an action to TS Table 3.3-1 to define that the provisions of Specification 3.0.3 are not applicable above 10 percent of thermal rated power with the number of operable intermediate range neutron flux channels two less than the minimum channels operable requirement.

Enclosure 1 provides an evaluation of the proposed TS change, including a no significant hazards consideration, an environmental review, and marked-up and revised (clean) pages of the SQN Units 1 and 2 TS. The proposed amendment is consistent with the intent of NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants," which establishes that the mode of applicability for the

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intermediate range neutron flux function is in Mode 1 is when the thermal power is below the P10 (Power Range Neutron Flux) interlocks.

TVA has determined that there are no significant hazards considerations associated with the proposed change and that the TS change qualifies for categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosure to the Tennessee State Department of Public Health.

TVA requests approval of this TS change by December 31, 2010. TVA will implement the revised TS within 60 days of NRC approval.

There are no regulatory commitments associated with this submittal.

If you have any questions about this change, please contact Fredrick Mashburn at (423) 751-8817.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 26th day of January, 2010.

Respectfully,

R. M. Krich
Vice President
Nuclear Licensing

Enclosure: Evaluation of the Proposed Change to Sequoyah Nuclear Plant Units 1 and 2 Technical Specifications

Enclosure
cc (Enclosure):

NRC Regional Administrator – Region II

NRC Senior Resident Inspector – Sequoyah Nuclear Plant

Division of Radiological Health - State of Tennessee

ENCLOSURE

TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT (SQN)
UNITS 1 AND 2
DOCKET NOS. 50-327 AND 50-328

EVALUATION OF THE PROPOSED CHANGE TO SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2 TECHNICAL SPECIFICATIONS

1.0 SUMMARY DESCRIPTION

This evaluation supports a request to amend Operating Licenses DPR-77 and DPR-79 for SQN Units 1 and 2. The proposed changes would revise TS Table 3.3-1 to resolve an oversight regarding the operability requirements for the intermediate range neutron flux channels. TVA proposes to add an action to TS Table 3.3-1 to define that the provisions of Specification 3.0.3 are not applicable above 10 percent of thermal rated power with the number of operable intermediate range neutron flux channels two less than the minimum channels operable requirement. This proposed change applies to SQN Units 1 and 2, TS Table 3.3-1 "Reactor Trip System Instrumentation," Functional Unit 5, "Intermediate Range, Neutron Flux."

2.0 DETAILED DESCRIPTION

TS Table 3.3-1 does not provide an action that addresses the declaration of two intermediate range neutron flux channels inoperable in Mode 1 with power above 10 percent of thermal rated power, (i.e., the P-10 setpoint). As a result, Specification 3.0.3 would apply. This requirement is unnecessarily restrictive, because the intermediate range neutron flux channels do not provide a protection function above the P-10 setpoint. Above the P-10 setpoint, the power range neutron flux trip and the power range neutron flux high positive rate trip provide core protection for a rod withdrawal accident. To resolve this issue, TVA proposes to add the following action to TS Table 3.3-1 for SQN Units 1 and 2:

> "ACTION 17 – With the number of OPERABLE channels two less than the minimum channels OPERABLE requirement and with the THERMAL POWER level above 10% of RATED THERMAL POWER, the provisions of Specification 3.0.3 are not applicable."

This change is needed to resolve an oversight in TS Table 3.3-1 regarding the operability requirements of the intermediate range neutron flux channels.

3.0 TECHNICAL EVALUATION

The intermediate range neutron flux trip function provides protection against an uncontrolled rod cluster control assembly bank withdrawal accident from a subcritical condition during startup. This trip function provides redundant protection to the power range, neutron flux low setpoint trip function.

As described in the Sequoyah Updated Final Safety Analysis Report (UFSAR) (Ref. 1), Section 7.2.1.1.2, the intermediate range high neutron flux trip circuit trips the reactor

when one out of the two intermediate range channels exceeds the trip setpoint. This trip, which provides protection during reactor startup, can be manually blocked if two out of four power range channels are above approximately 10 percent power (P-10). Three out of the four power range channels below this value automatically reinstates the intermediate range high neutron flux trip. The intermediate range channels can be individually bypassed at the nuclear instrumentation racks to permit channel testing at any time under prescribed administrative procedures and only under the direction of authorized supervision. This bypass action is annunciated on the control board.

The intermediate range neutron flux trip must be operable in Mode 1 below the P-10 setpoint and in Mode 2 when there is a potential for an uncontrolled rod withdrawal accident during reactor startup. Above the P-10 setpoint, the power range neutron flux high setpoint trip and the power range neutron flux high positive rate trip provide core protection for a rod withdrawal accident. Since the power range detectors perform the monitoring and protection functions above the P-10 setpoint, the intermediate range is not required above the P-10 setpoint. Therefore, the provisions of Specification 3.0.3 should not be for two inoperable intermediate range neutron flux channels above the P-10 setpoint.

The proposed change is consistent with the above described UFSAR reactor trips and accident analysis found in Chapter 15 and continues to protect the health and safety of the public. It is also consistent with the intent of NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants," which establishes that the mode of applicability for the intermediate range neutron flux function in Mode 1 is when the thermal power is below the P10 (Power Range Neutron Flux) interlocks.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

This proposed change does not change regulatory requirements. The proposed change is consistent with the intent of NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants," which establishes that the mode of applicability for the intermediate range neutron flux function in Mode 1 is when the thermal power is below the P10 (Power Range Neutron Flux) interlocks as depicted in Table 3.3.1-1, Function 4, Applicable Modes.

4.2 Precedent

As discussed in Section 4.1, the proposed change is consistent with the intent of NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants."

4.3 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 amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The intermediate range neutron flux trip must be operable in Mode 1 below the P-10 setpoint and in Mode 2 when there is a potential for an uncontrolled rod withdrawal accident during reactor startup. Above the P-10 setpoint, the power range neutron flux high setpoint trip and the power range neutron flux high positive rate trip provide core protection for a rod withdrawal accident. The intermediate range channels have no protection function above the P-10 setpoint. The proposed change does not affect the design of structures, systems, or components (SSCs) credited in accident or transient analyses, the operational characteristics or function of SSCs, the interfaces between credited SSCs and other plant systems, or the reliability of SSCs. The proposed change does not impact the initiating frequency of any UFSAR accident or transient previously evaluated. In addition, the proposed change does not impact the capability of credited SSCs to perform their required safety functions. Thus, eliminating the requirement to apply Specification 3.0.3 provisions when two intermediate range channels are inoperable in Mode 1 with the thermal power above the P-10 setpoint does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   Response: No.

   The intermediate range neutron flux trip must be operable in Mode 1 below the P-10 setpoint and in Mode 2 when there is a potential for an uncontrolled rod withdrawal accident during reactor startup. Above the P-10 setpoint, the power range neutron flux high setpoint trip and the power range neutron flux high positive rate trip provide core protection for a rod withdrawal accident. The intermediate range channels have no protection function above the P-10 setpoint. The proposed change does not involve a change in design, configuration, or method of operation of the plant. The proposed change does not alter the manner in which equipment operation is initiated, nor will the functional demands on credited equipment be changed. The capability of credited SSCs to perform their required function will not be affected by the proposed change. In addition, the proposed change does not affect the interaction of plant SSCs with other plant SSCs whose failure or malfunction can initiate an accident or transient. As such, no new failure modes are being introduced. Thus, eliminating the requirement to apply Specification 3.0.3 provisions when two intermediate range channels are inoperable in Mode 1 with the thermal power above the P-10 setpoint does not create the possibility of a new or different kind of accident.

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

   Response: No.

   The proposed change resolves an oversight regarding the operability requirements for the intermediate range neutron flux channels. Currently,

Specification 3.0.3 provisions apply when two intermediate range neutron flux channels are declared inoperable in Mode 1 when thermal power is above the P-10 setpoint. Above the P-10 setpoint, the power range neutron flux trip and the power range neutron flux high positive rate trip provide core protection for a rod withdrawal accident. The intermediate range channels have no protection function above the P-10 setpoint. The proposed change does not change the conditions, operating configurations, or minimum amount of operating equipment assumed in the safety analyses for accident or transient mitigation. The proposed change does not alter the plant design, including instrument setpoints, nor does it alter the assumptions contained in the safety analyses. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The proposed change does not impact the redundancy or availability of SSCs required to accident or transient mitigation, or the ability of the plant to cope with design basis events. In addition, no changes are proposed in the manner in which the credited SSCs provide plant protection or which create new modes of plant operation. Thus, eliminating the requirement to apply Specification 3.0.3 provisions when two intermediate range channels are inoperable in Mode 1 with thermal power above the P-10 setpoint does not involve a significant reduction in a margin of safety.

Based on the above, TVA concludes that the proposed amendments do not involve a 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.

4.4 Conclusions

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.

5.0 ENVIRONMENTAL CONSIDERATION

TVA 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 effluents 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 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. TVA Sequoyah Updated Final Safety Analysis Report
2. NUREG-1431, Revision 3, "Standard Technical Specifications Westinghouse Plants"

ATTACHMENTS

1. Marked-Up Pages of SQN Units 1 and 2 TSs
2. Revised (Clean) Pages of SQN Units 1 and 2 TSs

ATTACHMENT 1

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

MARKED-UP PAGES OF SQN UNITS 1 AND 2 TS

I. AFFECTED PAGE LIST

Unit 1

3/4 3-2
3/4 3-8

Unit 2

3/4 3-2
3/4 3-8

II. MARKED PAGES

See attached.

TABLE 3.3-1

REACTOR TRIP SYSTEM INSTRUMENTATION

	FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
1.	Manual Reactor Trip	2	1	2	1, 2, and *	1
2.	Power Range, Neutron Flux	4	2	3	1, 2	2
3.	Power Range, Neutron Flux High Positive Rate	4	2	3	1, 2	2
4.	Power Range, Neutron Flux, High Negative Rate	4	2	3	1, 2	2
5.	Intermediate Range, Neutron Flux	2	1	2	1, 2, and *	3
6.	Source Range, Neutron Flux					, 17
	A. Startup	2	1	2	2##, and *	4
	B. Shutdown	2	0	1	3, 4 and 5	5
7.	Overtemperature ΔT Four Loop Operation	4	2	3	1, 2	6
8.	Overpower ΔT Four Loop Operation	4	2	3	1, 2	6
9.	Pressurizer Pressure-Low	4	2	3	1, 2	6
10.	Pressurizer Pressure—High	4	2	3	1, 2	6
11.	Pressurizer Water Level—High	3	2	2	1, 2	6

TABLE 3.3-1 (Continued)

ACTION 11 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided that within 6 hours, for the affected protection set, the Steam Generator Water Level - Low-Low (EAM) channels trip setpoint is adjusted to the same value as Steam Generator Water Level - Low-Low (Adverse).

ACTION 12 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1.1 provided the other channel is OPERABLE.

ACTION 13 - Deleted

ACTION 14 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours.

ACTION 15 - With one of the diverse trip features (undervoltage or shunt trip attachment) inoperable, restore it to operable status within 48 hours or declare the breaker inoperable and apply ACTION 12. The breaker shall not be bypassed while one of the diverse trip features is inoperable except for up to 4 hours for performing maintenance to restore the breaker to OPERABLE status.

ACTION 16 - With the number of OPERABLE channels one less than the minimum channels operable requirement, restore the inoperable channel to OPERABLE status within 48 hours or open the reactor trip breakers within the next hour.

INSERT

ACTION 17 - With the number of OPERABLE channels two less than the minimum channels OPERABLE requirement and with the THERMAL POWER level above 10% of RATED THERMAL POWER, the provisions of Specification 3.0.3 are not applicable.

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5.	Intermediate Range, Neutron Flux	2	1	2	1, 2, and *	3	
6.	Source Range, Neutron Flux						
	A. Startup	2	1	2	2##, and *	4	
	B. Shutdown	2	0	1	3, 4 and 5	5	
7.	Overtemperature ΔT Four Loop Operation	4	2	3	1, 2	6	|
8.	Overpower ΔT Four Loop Operation	4	2	3	1, 2	6	|
9.	Pressurizer Pressure-Low	4	2	3	1, 2	6	|
10.	Pressurizer Pressure—High	4	2	3	1, 2	6	|
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, 17

TABLE 3.3-1 (Continued)

ACTION 10 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided that within 6 hours, for the affected protection set, the Trip Time Delays (T_S and T_M) threshold power level for zero seconds time delay is adjusted to 0% RTP.

ACTION 11 - With the number of OPERABLE channels one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may proceed provided that within 6 hours, for the affected protection set, the Steam Generator Water Level - Low-Low (EAM) channels trip setpoint is adjusted to the same value as Steam Generator Water Level - Low-Low (Adverse).

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ATTACHMENT 2

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SEQUOYAH NUCLEAR PLANT (SQN)
UNITS 1 AND 2

REVISED (CLEAN) PAGES OF SQN UNITS 1 AND 2 TS

I. AFFECTED PAGE LIST

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Unit 2

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TABLE 3.3-1 (Continued)

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ACTION 12 - With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.1.1.1 provided the other channel is OPERABLE.

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ACTION 16 - With the number of OPERABLE channels one less than the minimum channels operable requirement, restore the inoperable channel to OPERABLE status within 48 hours or open the reactor trip breakers within the next hour.

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