

Enclosure 4 contains proprietary information and should be withheld from public disclosure under 10 CFR 2.390. Upon removal of the proprietary information, this letter is decontrolled.



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

November 22, 2013

10 CFR 50.90

ATTN: Document Control Desk  
U. S. Nuclear Regulatory Commission  
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 Plants, Units 1 and 2 Technical Specifications  
Conversion to NUREG-1431, Rev. 4.0 (SQN-TS-11-10)**

Reference: TVA letter to NRC, "Third Status Update of Planned Actions to Facilitate Maintenance of 6.9 Kilovolt and 480 Volt Shutdown Boards at Sequoyah Nuclear Plant, Units 1 and 2," dated September 30, 2013

In accordance with the provisions of 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," the Tennessee Valley Authority (TVA) is submitting a request for an amendment to Facility Operating License Nos. DPR-77 and DPR-79 for the Sequoyah Nuclear Plant (SQN), Units 1 and 2, respectively. This amendment request would revise SQN's current Technical Specifications (CTS) to Improved Technical Specifications (ITS) consistent with the Improved Standard Technical Specifications (ISTS) described in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 4.0. The guidance of Nuclear Energy Institute (NEI) 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996, and Nuclear Regulatory Commission (NRC) Administrative Letter 96-04, "Efficient Adoption of Improved Standard Technical Specifications," dated October 9, 1996, were used in preparing this submittal. The detailed descriptions and justifications to support the proposed changes are provided in Enclosure 2, "SQN ITS Submittal, Volumes 1 through 16."

The following Enclosures are also included to assist the NRC in the review of this submittal:

Enclosure 1, "Contents of the Sequoyah Nuclear Plant, Units 1 and 2, Improved Technical Specifications (ITS) Submittal," describes the organization and content of the submittal, including each of the volumes in Enclosure 2.

Enclosure 3, "Licensee Identified Changes That May Require a Formal Technical Branch Review," provides a list and description of the changes included in the ITS submittal that differ from both the CTS and ISTS as described in NUREG-1431, Revision 4.0.

Enclosure 4, "Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) Instrumentation Completion Times, Bypass Times, and Surveillance Test Interval Extensions Based on WCAP-10271, WCAP-14333, and WCAP-15376," provides the evaluations that justify adoption of the changes to the RTS and ESFAS instrumentation completion times, bypass times, and surveillance test interval extensions.

Enclosure 5, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)," provides the evaluations that justify adoption of the changes to the extension of containment isolation valve completion times.

Enclosure 6, "Disposition of Existing License Amendment Requests," provides the disposition of other, currently docketed license amendment requests (LARs), as they relate to this LAR.

Enclosure 7, "Disposition of Generic Changes to NUREG-1431, Revision 4.0," lists the NRC-approved changes to NUREG-1431, Revision 4.0, as of March 6, 2011, and summarizes the disposition of each of these changes in this LAR.

Enclosure 8, "Regulatory Commitments," lists the commitments made in this submittal. The commitments in this submittal are only those contained in Enclosure 8.

Enclosure 9, "List of Required Final Safety Analysis Report (FSAR) Descriptions For TSTF-500," provides a summary of the FSAR descriptions required as part of the adoption of Technical Specification Task Force Traveler (TSTF)-500.

Enclosure 10, "Relocate Surveillance Frequencies to Licensee Control RITS-TF Initiative 5b (TSTF-425)," provides documentation of SQN's Probabilistic Risk Assessment (PRA) technical adequacy required as part of the adoption of TSTF-425.

Included in Enclosure 2 are the Bases for the proposed ITS. However, the Bases are not part of the technical specifications but are maintained consistent with the SQN Updated Final Safety Analysis Report (UFSAR).

Enclosure 4 contains, as noted attachments, the following Westinghouse proprietary and non-proprietary documents that were attachments to Westinghouse letter LTR-RAM-I-13-032, Rev. 1:

- 1) Summary Report Revision 1, "Sequoyah Nuclear Plant, Units 1 and 2, Implementation of Master and Slave Relays Technical Specification Changes Justified in WCAP-14333-P-A, Rev. 1 and WCAP-15376-P-A, Rev. 1," dated September 26, 2013, (Proprietary).

- 2) Summary Report Revision 2, "Sequoyah Nuclear Plant, Units 1 and 2, Implementation of Technical Specification Changes Justified in WCAP-14333-P-A, Rev. 1 and WCAP-15376-P-A, Rev. 1," dated September 26, 2013, (Proprietary).
- 3) Summary Report Revision 1, "Sequoyah Nuclear Plant, Units 1 and 2, Implementation of Master and Slave Relays Technical Specification Changes Justified in WCAP-14333-P-A, Rev. 1 and WCAP-15376-P-A, Rev. 1," dated September 26, 2013, (Non-Proprietary).
- 4) Summary Report Revision 2, "Sequoyah Nuclear Plant, Units 1 and 2, Implementation of Technical Specification Changes Justified in WCAP-14333-P-A, Rev. 1 and WCAP-15376-P-A, Rev. 1," dated September 26, 2013, (Non-Proprietary).

Also contained in Enclosure 4 as Attachment 5 is the Westinghouse Application for Withholding Proprietary Information from Public Disclosure CAW-13-3823, accompanying Affidavit, Proprietary Information Notice, and Copyright Notice. Because Attachments 1 and 2 of Westinghouse letter LTR-RAM-I-13-032, Rev. 1 contain information proprietary to Westinghouse Electric Company LLC, they are supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.390 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse affidavit should reference CAW-13-3823 and should be addressed to James A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, Suite 310, 1000 Westinghouse Drive, Cranberry Township, Pennsylvania 16066.

Attachments 3 and 4 to Enclosure 4 provide the non-proprietary versions of this information.

Please note that the CTS marked-up pages do not include NRC-approved Amendments 278 and 289 for Unit 1 and Amendments 269 and 279 for Unit 2. These amendments are not to be implemented until start up from the outage where SQN inserts tritium-producing burnable absorber rods in the core. At this time, the production of tritium in the SQN reactors has been delayed indefinitely. Therefore, the changes associated with these amendments are not included in the ITS submittal.

As described in the referenced letter, several changes are needed at SQN to permit the scheduling of preventive maintenance on the SQN 6.9 Kilovolt (kV) and 480 Volt (V) Shutdown Boards. These changes include: 1) An LAR to allow operation with one essential

raw cooling water (ERCW) pump operable per loop, 2) An LAR to allow operation with one 6.9 kV and associated 480 V shutdown boards inoperable for seven days, and 3) A plant modification to the Auxiliary Control Air System. The LAR that will allow operation with one ERCW pump per loop has been submitted as listed in Enclosure 6. This submittal proposes the change that will allow operation with a 6.9 kV and associated 480 V shutdown boards inoperable for seven days.

TVA requests approval of the proposed license amendment by November 30, 2014, to support implementation prior to the 2015 spring outage. Approval by the proposed date would also accommodate initial license operator training for the class of March 2015. TVA requests an implementation period of 180 days to accommodate completion of implementation activities.

Based on the information provided in Enclosure 2, TVA has determined that there is no significant hazards consideration associated with the proposed change and that the change is exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9).

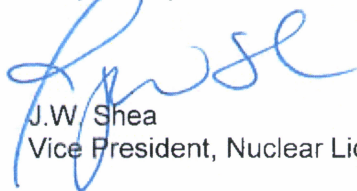
The SQN Plant Operations Review Committee has reviewed this proposed change and determined that operation of SQN in accordance with the proposed change will not endanger the health and safety of the public.

Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and the enclosures to the Tennessee State Department of Environment and Conservation.

If there are any questions or if additional information is needed, please contact Mr. Clyde Mackaman at 423-751-2834.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 22nd day of November 2013.

Respectfully,



J.W. Shea  
Vice President, Nuclear Licensing

Enclosures  
cc: See page 5

**GRW:**

- Enclosures:**
- Enclosure 1 – Contents of the Sequoyah Nuclear Plant, Units 1 and 2, Improved Technical Specifications (ITS) Submittal**
  - Enclosure 2 – SQN ITS Submittal, Volumes 1 through 16**
  - Enclosure 3 - Licensee Identified Changes That May Require a Formal Technical Branch Review**
  - Enclosure 4 - Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) Instrumentation Completion Times, Bypass Times, and Surveillance Test Interval Extensions Based on WCAP-10271, WCAP-14333, and WCAP-15376**
  - Enclosure 5 - Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)**
  - Enclosure 6 - Disposition of Existing License Amendment Requests**
  - Enclosure 7 - Disposition of Generic Changes to NUREG-1431, Revision 4.0**
  - Enclosure 8 - Regulatory Commitments**
  - Enclosure 9 - List of Required Final Safety Analysis Report (FSAR) Descriptions For TSTF-500**
  - Enclosure 10 - Relocate Surveillance Frequencies to Licensee Control RITS-TF Initiative 5b (TSTF-425)**

**cc (Enclosures):**

**NRC Regional Administrator – Region II**  
**NRC Senior Resident Inspector – Sequoyah Nuclear Plant**  
**Director, Division of Radiological Health - Tennessee State Department of Environment and Conservation**