

NRR-PMDAPEm Resource

From: Hon, Andrew
Sent: Thursday, July 06, 2017 1:44 PM
To: Hess, Thomas A (tahess@tva.gov)
Cc: Goel, Vijay; Shoop, Undine
Subject: Sequoyah Nuclear Station, Unit 1 & 2 – Request For Additional Information Related to LAR for Technical Specification 3.8.1.17 Note modification (CAC NOS. MF9398 AND MF9399)

By letter dated March 13, 2017, (Agency wide Document Access Management System (ADAMS) Accession No. ML17073A018), Tennessee Valley Authority requested an amendment to Facility Operating License Nos. DPR-77 and DPR-79 for the Sequoyah Nuclear Plant (SQN), Units 1 and 2. The proposed amendment would modify a Note associated with Technical Specification (TS) Surveillance Requirement (SR) 3.8.1.17 to allow the performance of the SR in Modes 1 through 4 when the associated load is out of service for maintenance or testing.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed below. The proposed questions were discussed by telephone with your staff on June 29, 2017. Your staff confirmed that these questions did not include proprietary or security-related information and agreed to provide a response August 7, 2018 to this request for additional information (RAI).

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. Please note that if you do not respond to this request by the agreed-upon date or provide an acceptable alternate date, we may deny your application for amendment under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108. If circumstances result in the need to revise the agreed upon response date, please contact me at (301) 415-8480 or via e-mail Andrew.Hon@nrc.gov.

Regulatory Requirement

The regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.36(c)(2)(i) "Limiting conditions for operation" states, in part, that limiting conditions for operation (LCOs) are the lowest functional capability performance levels of equipment required for safe operation of the facility. When a limiting condition for operation is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

10 CFR 50.36(c)(3), "Technical Specifications," include SRs, which are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. The SR 3.8.17 in the licensee amendment request (LAR) is related to the requirements 10 CFR 50.36(c)(3).

Request for Additional Information (RAI) No. 1

In the LAR on Page E-2, the licensee stated that SQN does not have a single load sequence timer to apply loads to the diesel generator (DG) under accident and loss of offsite power conditions. SQN uses discrete timers that sequentially apply the individual loads to the DG to respond to an accident or loss of offsite power condition.

Please provide the following additional information regarding the load sequencer:

- a) The physical location of the discrete timers that sequentially apply the individual loads to the DG to respond to an accident or loss of offsite power condition.
- b) How the discrete timers distinguish between an accident or loss of offsite power condition.
- c) A typical example (including a schematic diagram etc.) showing the application of discrete timer(s) to a safety-related load.

RAI 2

In the LAR on Page E-3, the licensee stated as follows:

Calibration of the time delay relays, associated with automatic load sequence timers, may defeat certain functions in the downstream equipment energized by the timer, which may require entry into LCO Actions for the associated function. However, the time required to perform the calibration is typically a small fraction of the LCO Completion Time. Maintenance and testing of the associated functions typically require periodic entry into these same LCO Actions. Coupling the calibrations with existing maintenance or testing does not increase the unavailability of the equipment.

Please provide following additional information regarding the above statements:

- a) Whether the SR 3.8.1.17 is performed on a load sequencer timer which impacts only one safety-related load or one DG at any given time.
- b) The approximate amount of time typically taken to perform SR 3.8.1.17. Also, provide the currently established frequency of performance of this surveillance.

Docket Nos. 50-327 and 50-328

Andy Hon, PE

Project Manager (Brunswick Nuclear Plant 1 & 2, Sequoyah Nuclear Plant 1 & 2)

Plant Licensing Branch II-2

Division of Operating Reactor Licensing

Office of Nuclear Reactor Regulation

301-415-8480

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Tracking Status: None
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Tracking Status: None
"Hess, Thomas A (tahess@tva.gov)" <tahess@tva.gov>
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