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April 24, 1980

Director of Nuclear Reactor Regulation
Attention: Mr. L. S. Rubenstein, Acting Chief
Light Water Reactors Branch No. 4
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Rubenstein:

In the Matter of the Application of	)	Docket Nos. 50-327
Tennessee Valley Authority	)	50-328

The Sequoyah Nuclear Plant Engineered Safety Features (ESF) were reviewed in accordance with the six criteria transmitted by your letter to H. G. Parris dated March 19, 1980. Enclosed are the results of this review.

TVA is in compliance with all of the criteria except for the one point outlined in item 1. Design changes have been initiated to bring Sequoyah Nuclear Plant into full compliance.

If you have any questions, please get in touch with D. L. Lambert at FTS 854-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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(1) It is the NRC's position that the overriding of one type of safety actuation signal (e.g., particulate radiation) should not cause the blocking of any other type of safety actuation signal (e.g., iodine radiation, reactor pressure) for those valves that have no function other than containment isolation.

Response

The containment high radiation and containment isolation (safety injection signal) are treated as one signal. If one of the signals is present and has been overridden by the manual reset switch, the other signal will be blocked as long as the overridden signal is present. This is part of the Westinghouse solid state protection system design. These signals control the containment purge valves.

(2) It is the NRC's position that physical features (e.g., key lock switches) should be provided to ensure adequate administrative controls.

Response

Physical features are used, where required, to ensure adequate administrative controls.

(3) It is the NRC's position that a system level annunciation of the overridden status should be provided for every safety system impacted when any override is active. (See Regulatory Guide 1.47).

Response

Bypass signals are annunciated. Manual override of signals is not annunciated but is indicated on status lights. This meets the requirements of Regulatory Guide 1.47, "Bypassed and Inoperable Status Indication for Nuclear Power Plant Safety Systems."

(4) It is the NRC's position that the following diverse signals should be provided to initiate isolation of the containment purge/ventilation system: containment high radiation, safety injection actuation, and containment high pressure (where containment high pressure is not a portion of safety injection actuation).

Response

Isolation of containment purge valves is initiated by containment radiation and safety injection where containment high pressure is a portion of S.I. actuation.

(5) It is the NRC's position that the instrumentation systems provided to initiate containment purge ventilation isolation should be designed and qualified to Class IE criteria.

Response

Instrumentation systems used to initiate containment purge isolation are qualified to Class IE criteria.

(6) It is the NRC's position that the overriding or resetting of the ESF actuation signal should not cause any equipment to change position.

Response

The requirement that overriding or resetting ESF actuation signals should not cause any equipment to change position is undergoing review and verification as required by IE Bulletin No. 80-06.