

400 Chestnut Street Tower II

July 3, 1980

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Schwencer:

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

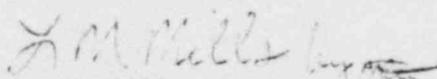
Enclosed is a revision to TVA's commitment made in the Fire Protection Program Reevaluation (FPPR) for Sequoyah Nuclear Plant. This revision concerns the commitment for locking of fire protection water system valves made in section A.3(b) of the FPPR.

This revision was initially documented in my letter to J. P. O'Reilly dated May 6, 1980, which responded to deviation items 50/327/80-10-02 and 50-328/80-06-02.

If you have any questions, please get in touch with D. L. Lambert at FTS 857-2581.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


L. M. Mills, Manager
Nuclear Regulation and Safety

Enclosure

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ENCLOSURE

SEQUOYAH NUCLEAR PLANT FIRE PROTECTION COMMITMENTS

Section A.3(b) of TVA's Fire Protection Program Reevaluation (FPPR) for Sequoyah Nuclear Plant commits TVA to lock all valves in the fire protection water system in their normal position. Further review of the fire protection plan has made it necessary to revise this commitment as follows.

All exterior lockable valves in the high-pressure fire protection system flow path between the fire pumps and various sprinkler/water spray system isolation valves are presently locked in their proper position. All interior sectionalizing valves are also being locked in their proper position. The various isolation valves to the individual sprinkler and water spray systems are not all locked.

TVA is opposed to locking the individual sprinkler and water spray system isolation valves in the open positions. TVA is in total agreement that it is essential to maintain these valves in their proper position; however, TVA also recognizes the necessity of prompt isolation in the event of inadvertent system actuation or mechanical damage to minimize water damage. Therefore the following actions will be taken.

1. All lockable valves between the water supply (fire pump discharge) and the individual sprinkler or water spray and sectionalizing valves will be locked. This is to include all yard isolation and sectionalizing valves and all isolation valves to water spray systems which are located in the yard areas (including valves in valve pits). These valves will be verified to be in their proper lineup and to be locked by means of an existing surveillance instruction (on a monthly basis).
2. All interior sprinkler and water spray system isolation valves will be sealed in the open position. The existing surveillance instruction on valve lineup inspections will be revised or a new instruction will be prepared to require that these sealed valves be inspected for proper lineup and seal integrity on a weekly basis.
3. It is not feasible to either lock or seal the containment isolation valves in the fire protection systems for the reactor building. To do either would defeat or degrade the capability of these valves to close automatically in the event of containment isolation. Containment isolation is these valves' primary and overriding function, and their location in the flow path to the fire protection systems inside containment is a secondary consideration.

A specific exception from locking, or sealing, requirements is requested for all containment isolation valves in the fire protection systems. These valves are all located in secured areas with limited access. Our administrative controls also require these valves be inspected at least

once every 31 days for proper positions and also returned to normal (open) position following phase "A" containment isolation. The combination of administrative controls and the valves' physical location provides adequate assurance of proper valve position.

This proposal is not identical to our original commitment; however, it is totally consistent with NFPA 26-1976, "Recommended Practices for the Supervision of Valves Controlling Water Supplies for Fire Protection."