

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

June 8, 1981



Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

In the Matter of the Application of ) Docket No. 50-328  
Tennessee Valley Authority )

As requested by R. L. Tedesco on June 4, 1981, TVA has reviewed the proposed facility operating license for Sequoyah unit 2. As requested, we have focused our review on the appropriateness of the implementation schedules as defined in the draft license. Enclosed is a statement with justification on each item with the references to our previous requests for changes in schedule.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Sworn to and subscribed before me  
this 8<sup>th</sup> day of June 1981

Paulette H. White

Notary Public

My Commission Expires 9-5-84

Enclosures

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ENCLOSURE  
DISCUSSION OF LICENSE CONDITIONS  
FOR OPERATING LICENSE NO. DPR-79

The following discussion summarizes exceptions to the schedules for some of the items in the draft DPR-79 dated June 2, 1981. A justification and applicable references are stated as appropriate with each item.

Item 2.C(10) Environmental Qualification (Section 7.2.2)

Change subparagraph a. to read as follows.

No later than June 30, 1982, TVA shall be in compliance with the requirements of NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," for safety-related equipment exposed to a harsh environment. Scheduler exceptions may be granted for documented procurement problems associated with industry demand or a documented problem of vendors being unable to supply qualified equipment in accordance with the requirements of NUREG-0588.

Justification

As stated in a TVA letter from L. M. Mills to H. R. Denton dated May 28, 1981, TVA has made and will continue to make every reasonable effort to comply with the requirements of NUREG-0588. However, several conditions over which TVA has no control may preclude full implementation of these requirements by June 30, 1982. These conditions include the inability of equipment vendors to provide equipment qualified to the pertinent qualification standards in sufficient quantities to meet demand. Additionally, due to the nuclear industry's competitive demand for qualified equipment, the lead time between actually purchasing the equipment and delivery of the equipment for installation is expected to be significant.

Item 2.C.(11) Requirements for Modification to or Addition of Instrumentation and Controls (Section 7.3.2)

Change subparagraph (a) to read as follows.

Prior to startup after first refueling, TVA shall have installed instrument downscale failure alarms for the effluent monitoring instrumentation channels for...been completed.

Justification

The difference from a date of 18 months after issuance of this license and a date of first refueling does not represent a significant risk to the health and safety of the public since it is expected that first refueling will start about 18 months from the date of the issuance of this license.

Item 2.C.(13) Fire Protection System (Section 9.5)

Delete items in subparagraphs a. and b. The fire protection modifications for ERCW have been completed.

Change subparagraph c. to read as follows.

TVA shall replace the control room ceiling panels with acceptable panels prior to September 1, 1981, on unit 2.

Justification

TVA cannot commit to a 5-percent power date when the 5-percent power level is expected as early as July 15, 1981. The earliest possible delivery date for the new ceiling materials is August 5, 1981. With allowance for contingencies, TVA can commit to September 1, 1981, as the installation date of all panels for unit 2. The 45-day grace from an optimistic date of July 15, 1981, does not represent a significant risk to the health and safety of the public because Sequoyah has an alternate shutdown room, the probability of a fire during this period is small, and the decay heat/radionuclide inventory is small.

Item 2.C.(16)f. Reactor Coolant System Vents (Section 22.2,II.B.1)

Change implementation date from July 1, 1982, to prior to startup after first refueling of unit. 2.

Justification

TVA has previously requested an exception to the implementation schedule on this item in letters dated February 20, 1981, and April 3, 1981, from L. M. Mills to A. Schwencer. The design scope for the reactor coolant system vents is complete and procurement is proceeding on schedule. The design drawings for installation are not completed. This modification involves a considerable amount of work in installation of piping, wiring, and conduit which requires a forced plant outage which is currently estimated as a minimum of eight weeks in cold shutdown to install and to ensure operational readiness. Furthermore, it is TVA's position, as well as the position of the Westinghouse Owners Group, that this system must be used in conjunction with the reactor vessel level instrumentation system (see item II.F.2 discussion).

Item 2.C.(16)g. Post Accident Sampling (Section 22.2.II.B.3)

Change implementation date from January 1, 1982, to prior to startup after first refueling of unit 2.

Justification

TVA has previously requested an exception to the implementation schedule on this item in letters dated February 20, 1981, and April 3, 1981, from L. M. Mills to A. Schwencer. The design scope for post-accident sampling is essentially complete. The addition of a component cooling water booster pump may be required to meet the anticipated system cooling water requirements. Procurement estimates for delivery of this pump range from an early date of January 1982 to a late date of June 1982. In addition, a number of modifications to the heating, ventilating, and air-conditioning (HVAC) system are required to support operation of the post-accident sampling system. This HVAC work is not expected to be complete for unit 2 before June 1982. Furthermore, the work inside containment will require extensive piping and penetration work which will require at least six weeks in cold shutdown to complete installation and testing.

Item 2.C.(16)h.(2)(b) Hydrogen Control Measures (Section 22.2.II.B.7)

Delete the words "The results of these investigations will be provided to the staff for review in June 1981."

Justification

TVA presented this information in a meeting with the staff in May 1981. The information was transmitted by L. M. Mills' letter to E. Adensam dated June 2, 1981.

Item 2.C.(16)i. Relief and Safety Valve Test Requirements  
Section 22.2.II.D.1)

Change paragraph to read as follows.

TVA is participating in the EPRI owners' group effort on this item and is committed to conform to the results of this effort. A report concerning the test results on the Sequoyah relief and safety valves is expected from TVA by April 1, 1982.

Justification

TVA is participating in the EPRI and the Westinghouse owners' groups programs concerning this item. Schedules are not completely under TVA's control. Current schedules for testing have been coordinated with NRC (see EPRI letter from R. Youngdahl to D. Eisenhut dated December 15, 1980).

Therefore, the September 1, 1981, date cannot be met unless NRC, TVA, and EPRI concur in changes to the test program schedule. By April 1, 1982, TVA will provide a report with justification that the EPRI program demonstrates the functionability of the as-installed valves. TVA does not expect to submit detailed piping analyses and proposed pipe and pipe support modifications for review (if any are needed) prior to July 1, 1982 (see Mr. Youngdahl's letter).

Item 2.C.(16)l. Additional Accident Monitoring Instrumentation  
(Section 22.2,II.F.1)

Change implementation date from January 1, 1982, to prior to startup after first refueling of unit 2.

Justification

TVA has previously requested an exception to the implementation schedule on this item in letters dated February 20, 1981, and April 3, 1981, from L. M. Mills to A. Schwencer. Although installation of additional accident monitoring instrumentation would require less than two weeks of forced outage in cold shutdown for SNP unit 2, procurement of these items is a problem. The noble gas monitors for inside containment are currently scheduled for delivery in July 1982; however, TVA will not know until October 1982 if the qualification testing has successfully met the requirements of IEEE 323-1974 (aging). Furthermore, noble gas stack monitors to meet TVA bid specifications for instrument range and qualification requirements are not presently available. Potential vendors for the stack monitors have indicated a minimum 2-year delivery time from contract award for designs which may have exceptions to the TVA specifications for these noble gas stack monitors. Therefore, TVA believes that a planning date for installation should be at least the first refueling outage for SNP unit 2. If the planning date for installation were slipped, TVA believes the installed instrumentation for accident monitoring would more likely meet the NRC requirements.

Item 2.C.(16)m. Instruments for Inadequate Core Cooling  
Section 22.2,II.F.2

Change implementation date from January 1, 1982, to prior to startup after first refueling of unit 2.

Justification

TVA has previously requested an exception to the implementation schedule on this item in letters dated February 20, 1981, and April 3, 1981, from L. M. Mills to A. Schwencer. The



design scope for vessel level instrumentation is complete and procurement is on schedule. The design drawings are not complete. This modification involves considerable piping, pipe support, wiring, and conduit installation inside containment. The preliminary estimate for this item is an 8-week forced outage at cold shutdown to complete installation and checkout. Furthermore, it is TVA's position that the adequacy of this system and its associated operational procedures are an unreviewed safety question requiring NRC review before the system is placed into operation.

Item 2.C.(16)r. Upgrade Emergency Support Facilities  
Section 22.2, III.A.1.2

Delete subparagraph (2).

Justification

TVA provided the conceptual design of the emergency support facilities by letter from L. M. Mills to H. R. Denton dated June 2, 1981.

Change subparagraph (3) to read as follows.

TVA will complete the upgraded emergency support facilities by July 1, 1983.

Justification

TVA made the commitment to a July 1, 1983, implementation date in the L. M. Mills to H. R. Denton letter of June 2, 1981. The reason for the July 1, 1983, date is construction and procurement time for an improved Technical Support Center precludes an earlier date (see June 2, 1981 letter). The July 1, 1983, date is a best-effort schedule. The emergency support facilities at Sequoyah and within TVA provide adequate interim protection. A delay of nine months for improved facilities does not represent a significant risk to the health and safety of the public.

Item 2.C.(16)s. Long-Term Emergency Preparedness (Section  
Section 22.2, III.A.2)

Delete subparagraph (1).

Justification

TVA interprets this requirement for a telephone system as an NRC item pursuant to NRC letter from J. P. O'Reilly to H. G. Parris dated April 25, 1980, concerning Health Physics Network (HPN) phones to be installed and paid for by NRC. Section III.A.2 of the Supplements of the SNP Safety Evaluation Report states that "The NRC will have direct telephone access to TVA, but the specific design for this telephone system has not been clarified and must be done so prior to full power operations." TVA objects to this SER statement since TVA awaits NRC clarification, as well as instructions to the telephone companies, as to where NRC wants these telephones.