



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket Nos. 50-327
and 50-328

January 18, 1990

Mr. Oliver D. Kingsley, Jr.
Senior Vice President, Nuclear Power
Tennessee Valley Authority
6N 38A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Mr. Kingsley:

SUBJECT: TECHNICAL SPECIFICATION CHANGE 90-04 (TAC 75567/75568) - SEQUOYAH
NUCLEAR PLANT, UNITS 1 AND 2

In your letter dated January 5, 1990, you proposed amendments to Section 3/4.8.1.1, Alternating Current (AC) Sources, of the Sequoyah Nuclear Plant, Units 1 and 2, Technical Specifications (TSs). The proposed changes revise Action Statement "a" of Limiting Condition for Operation (LCO) 3.8.1.1 to allow continued operation of the units for 72 hours with one train of diesel generator sets, 1A-A and 2A-A or 1B-B and 2B-B, inoperable. With either train inoperable, the remaining AC sources listed in LCO 3.8.1.1 would be demonstrated operable by performing surveillance requirement (SR) 4.8.1.1.1.a within one hour and at least once per eight hours thereafter and SR 4.8.1.1.2.a.4 within 24 hours. The inoperable diesel generator sets would be returned to operable status within 72 hours or the units would be shut down.

You stated that the Tennessee Valley Authority (TVA) is performing maintenance and repairs on the essential raw cooling water (ERCW) strainers. This work requires isolation of the associated ERCW headers for approximately 30 hours. Because there are two ERCW trains, one train is isolated at a time and that train and the equipment served by the train are declared inoperable. An inoperable ERCW train requires entry into a 72-hour action statement which for the Unit 2 ERCW headers and strainers, is sufficient to perform the work. No equipment which is supplied cooling water by the Unit 2 ERCW train has an action statement requiring a unit shutdown in less than 72 hours.

For the Unit 1 ERCW train, you have concluded that isolation of either of the Unit 1 headers will require the units to enter LCO 3.0.3 and shutdown within seven hours. Since this is significantly less than the 30 hours required, you have proposed the amendments to the TSs.

Your conclusion was based on the fact that the Unit 1 ERCW train provides cooling water to the four emergency diesel generator sets. Isolating either Unit 1 header will render a train of diesel generator sets (i.e., 1A-A and 2A-A or 1B-B and 2B-B) inoperable. Your interpretation of the action statements for LCO 3.8.1.1 is that they do not apply to this situation of working on the ERCW strainers and, therefore, with either of the Unit 1 ERCW headers inoperable, LCO 3.0.3 applies.

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TVA has evaluated several options to maintain the diesel generators operable during the Unit 1 ERCW strainer work. It has concluded that each option requires a significant amount of engineering work and physical plant modifications. You conclude that these options are not a prudent expenditure of resources.

You stated that the maintenance and repairs on the Unit 1 ERCW strainers are scheduled to begin on January 19, 1990. This is based on environmental conditions (e.g., temperature of the Tennessee River) and the impact on the Unit 1 Cycle 4 refueling outage which is scheduled to begin in March 1990. Therefore, you have requested that this amendment be processed on an exigent basis.

We have reviewed your application and the Action Statements for LCO 3.8.1.1. We conclude that Action Statement "d" allows you to have a diesel generator train inoperable for up to 72 hours before the units must begin shutting down. This is consistent with the requirements in (1) the TSs for loss of a train of safety equipment, (2) the NRC Standard Technical Specifications for Westinghouse Pressurized Water Reactors and (3) the design basis of the units. Because Action Statement "d" is confusing on the loss of a single train of diesel generators, we will act on your application. This will be the subject of a future letter. Until then, you may have a train of diesel generators inoperable for up to 72 hours without shutting down the units. Thereafter, as Action Statement d states, you must have the units in Mode 3 within the next six hours and in Mode 5 within the next 30 hours.

Sincerely,

Original signed by

Suzanne C. Black, Assistant Director
for Projects
TVA Projects Division
Office of Nuclear Reactor Regulation

cc: See next page

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