

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

November 3, 1981



Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Ms. Adensam:

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

As stated in Table 14.1-2(a) of the Sequoyah Nuclear Plant FSAR, we have planned a Rod Group Drop and Plant Trip Test (SU-9.5) for unit 2 at the 50-percent power level as part of our initial test program. As required by item 2.C(3).a of the unit 2 operating license, TVA must have NRC approval before making a "major modification" to the initial test program. Enclosed is the basis for our request to delete startup test SU-9.5 from our initial test program for unit 2.

Based on the information contained in the enclosure, we believe that startup test SU-9.5 can be deleted without any degradation to the startup test program. Please provide a response to our request as soon as possible, but no later than November 20, 1981, in order for us to delete the test before reaching the 50-percent power level.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Manager
Nuclear Regulation and Safety

Sworn to and subscribed before me
this 3rd day of Nov. 1981

Bryant M. Lowery
Notary Public

My Commission Expires 4/4/82

Enclosure

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ENCLOSURE

BASIS FOR DELETION OF STARTUP TEST SU-9.5
ROD GROUP DROP AND PLANT TRIP

Startup test SU-9.5, "Rod Group Drop and Plant Trip," is performed to demonstrate operation of the power range negative rate trip circuitry by dropping two rods selected because their proximity to the excore detectors makes the detector response more limiting for the 3/4-trip test acceptance criteria.

Startup test SU-9.5 is different from, and is not intended to address, the single rod drop and subsequent plant trip issue which is still open between NRC and Westinghouse. As stated in section 4.2 of NUREG-0011, Supplement 1, "Sequoyah Nuclear Plant Safety Evaluation Report (SER)," NRC has accepted an interim procedural position which provides protection against single rod drops which is a more limiting case than the rod group drop test. We have incorporated this interim procedural position which was identified in section 4.2 of the Sequoyah SER.

Since the core designs of Sequoyah units 1 and 2 are identical, repetition of SU-9.5 for unit 2 would not provide any additional information beyond that obtained in the unit 1 test which was performed November 22, 1980. Therefore, this additional test represents an unnecessary challenge to the reactor protection system without any increase in plant safety verification beyond that previously obtained in the unit 1 test.

Based on the above facts, we believe that startup test SU-9.5 can be deleted without degradation of the startup test program.