

*Docket*



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

October 18, 1990

Docket Nos. 50-327  
and 50-328

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 SPECIFICATIONS TO LIMIT OVERTIME (TMI ITEM 1.A.1.3) -  
SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated March 29, 1990, we issued our safety evaluation of your response dated January 7, 1983 to Generic Letter (GL) 82-16, "NUREG-0737 Technical Specifications," dated September 20, 1982. The GL identified 12 TMI Action Plan items, including the limit on overtime, TMI Action Plan Item 1.A.1.3, for which the staff had determined that plant technical specifications were needed to assure that plant operation is maintained within acceptable limits. In your response to the GL for Item 1.A.1.3, you provided justification that the Sequoyah Technical Specifications (TSs) did not need technical specifications to limit overtime. Although, we did delete requirements on overtime from the Unit 1 TSs in our letter dated March 25, 1982, the basis for this change was only to have the Unit 1 TSs consistent with the then recently issued Unit 2 TSs and did not consider the TMI Action Plan requirements in GL 82-16, because the GL had not been issued. In the safety evaluation on GL 82-16 dated March 29, 1990, we concluded that Sequoyah Procedure AI-30 is sufficient for Sequoyah to meet the requirements in the GL on overtime and additional technical specifications were not needed. However, we further stated that if the staff should identify any significant problems in the implementation of this and other procedures, we would request that you propose the model technical specifications for Item 1.A.1.3 in GL 82-16 for the TSs.

In Inspection Report 50-327/328, 90-22 dated July 26, 1990, we issued Violation 90-22-01 in that the overtime requirements of AI-30 were exceeded on numerous occasions without proper authorization. This problem was also identified in late 1987 and early 1988 as evidenced by a violation issued on March 14, 1988. In your response to Violation 90-22-01 dated August 31, 1990, you admitted the violation and submitted the corrective actions that will be taken to avoid further violations in this area. None of the corrective actions pertained to the consideration of proposing technical specifications to limit overtime in accordance with GL 82-16.

We consider this violation a significant problem in the implementation of your control of overtime at Sequoyah. Therefore, because you have admitted the violation, we request that you submit, within 120 days of receipt of this letter, technical specifications on overtime consistent with the guidance in GL 82-16. This response will be after the completion of the current Unit 2 Cycle 4 refueling outage.

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Mr. Oliver D. Kingsley, Jr.

-2-

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance for the request for information is not required under Public Law 96-511.

Sincerely,

Original signed by

Frederick J. Hebdon, Director  
Project Directorate II-4  
Division of Reactor Projects - 1/II  
Office of Nuclear Reactor Regulation

cc: See next page

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- 3 -

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