



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENCLOSURE 3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 178 TO FACILITY OPERATING LICENSE NO. DPR-77
AND AMENDMENT NO. 169 TO FACILITY OPERATING LICENSE NO. DPR-79
TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 50-327 AND 50-328

1.0 INTRODUCTION

By application dated December 7, 1993, the Tennessee Valley Authority (the licensee) proposed amendments to the Technical Specifications (TS) for Sequoyah Nuclear Plant (SQN) Units 1 and 2. The requested changes would incorporate the following changes to Section 6.0, "Administrative Controls," of the Technical Specifications (TS): (1) delete Section 6.1.2 that indicates the Corporate Manager of Radiological Control has the responsibility for the radiological environmental program, dose calculations, and projections; (2) add a requirement in Section 6.5.1.6 for review of the Offsite Dose Calculations Manual (ODCM) by the Plant Operations Review Committee (PORC); (3) add implementation of the ODCM to Section 6.8.1 as an activity requiring written procedures and delete the requirement that they be maintained by the Radiological Control Group; (4) delete the requirement in Section 6.8.4.a for Radiological Control to implement and control the ODCM; (5) change the review authority for changes to the ODCM from the Radiological Assessment Review Committee (RARC) to the PORC and added a reference to Specification 6.5.1A in Section 6.14.1.2; (6) change the approval authority for deviations from the overtime guidelines in Section 6.2.2.g to show that Plant Manager designee also has the authority in accordance with procedures and documentation; (7) change PORC member titles to the reflect current organizational structure; (8) delete the requirements for the RARC from Sections 6.5.2.7.i, 6.5.3, 6.10.2.k and the index; (9) move the condenser in-leakage monitoring requirement from Section 6.8.5.c.(vii) to 6.8.5.c.(iii) and delete the requirement to repair, plug, or isolate leaks; (10) change the title "Shift Supervisor" (SS) to "Shift Operations Supervisor" (SOS) in various locations in Section 6 and in Operating License Items 2.C.(23).A and 2.C.(16).a for Units 1 and 2 respectively; (11) change the title of the Senior Vice President, Nuclear Group, in Section 6.2.1 to Senior Vice President, Nuclear Power; (12) change the title of the Operational Quality Assurance Program in Section 6.5.2.8.d to Nuclear Quality Assurance Program; and (13) move the requirement for implementation of the Quality Assurance Program for environmental monitoring from Section 6.8.4.b to Section 6.8.1.h. Other TS Section 6.0 administrative changes related to these changes would also be incorporated that affect the index and definitions.

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2.0 EVALUATION

Responsibility for the Offsite Dose Calculation Manual (ODCM) was given to the Corporate Manager of Radiological Control and the Radiological Assessment Review Committee (RARC) when the program was established in previous Sequoyah amendments. The RARC was originally created to review and approve all matters relating to the ODCM in accordance with the TVA organizational structure existing at the time. This structure placed development and maintenance of dose calculation methods, as well as the design and operation of the Radiological Environmental Monitoring Program, with an offsite organization that was not within TVA's Nuclear Power organization. The RARC, with offsite and plant representatives on the committee, reviewed and approved all changes to the ODCM, all TS changes related to ODCM issues, procedures that implement the ODCM, and the results of and quality assurance audits of the ODCM implementation programs.

Due to recent TVA organizational changes, all responsibility for the contents of the ODCM will be shifted from the offsite organization to the TVA Nuclear Power organization. To reflect this transfer of responsibility in the TS, several changes have been proposed by the licensee. These changes would delete ODCM-related TS Sections that refer to the Corporate Manager of Radiological Control, assign responsibility for review of the ODCM to the Plant Operations Review Committee (PORC), indicate that written procedures are necessary for the implementation of the ODCM, delete the requirement that the procedures be maintained by the Radiological Control Group, delete the requirement that the Radiological Control Group implement and control the ODCM, change the review authority for changes to the ODCM from the RARC to the PORC, and remove various requirements related to the RARC from the TS.

The licensee has indicated that these proposed changes will cause the review, approval, and implementation of the ODCM to be at the same level as other activities such as surveillance testing and the Radiological Emergency Plan. Also, the existing responsibilities and authorities of the Corporate Manager of Radiological Control and the RARC involved with implementation of the ODCM will be retained, but within the onsite Nuclear Power organization. Changes to the ODCM will continue to receive adequate review and approval through the independent qualified reviewer program and the PORC. Thus, the appropriate level of administrative control is maintained. In addition, the proposed changes are consistent with the standard TS. Based on this information, the staff finds the changes acceptable.

The licensee has also proposed a change to the TS to clarify the administrative control needed for approval of deviations from the overtime requirements specified in the TS. The change would allow the Plant Manager to use administrative procedures to designate the appropriate individuals that will have the authority to review and approve overtime deviations. The present TS requires authorization by the Plant Manager, Duty Plant Manager, or higher levels of plant management. In addition, the proposed change would specify that any deviation from the TS overtime guidance must be authorized in advance, and continue to require that the basis for granting the deviation be

documented. The Plant Manager will continue to have control of overtime usage through monthly reviews of individual overtime and the designation of approval authorities. This change will enhance the ability of the licensee to comply with the TS overtime requirements on backshift, weekends, and holiday periods. Also, the proposed change is consistent with the standard TS. Based on this information, the staff finds this change acceptable.

The licensee has also proposed changes to the titles of various PORC members designated in the TS in order to be consistent with the current Sequoyah organizational titles. The Site Radiological Control Manager would become the Radiological and Chemistry Manager, the Quality Audit and Monitoring Manager would become the Quality Audit and Assessment Manager, and the Nuclear Engineering Representative would become the Site Engineering Representative. These changes do not alter the position responsibilities, nor do they change the composition of the PORC. The staff has determined that these changes are acceptable.

The licensee proposed changes to the Secondary Water Chemistry section of the TS that would move the requirement to monitor the discharge of the condensate pumps for evidence of condenser in-leakage, Section 6.8.5.c.(vii), into the existing requirement for identification of process sample points in Section 6.8.5.c.(iii), and deletion of extraneous verbiage. Thus, the proposed change would result in specifying that the condensate pump discharge be included in the list of process sample points used in the secondary water chemistry program to inhibit steam generator tube degradation, rather than specifying the requirement in a separate section. In addition, the licensee proposed deletion of the requirement to repair, plug or isolate a leak within 96 hours when condenser in-leakage is confirmed. The licensee has determined that this requirement was part of the initial version of the TS issued for startup, and appears to have been based on Branch Technical Position METB 5-3 and the Standard Review Plan, NUREG 0800. However, plant procedures implement action levels and time-frames that are consistent with industry guidance and Electric Power Research Institute recommendations, which provide better control of secondary water chemistry. The standard TS do not contain a requirement related to leakage levels and time-frames. Based on this information, the staff has determined that the proposed change is satisfactory.

The licensee proposed changing the organization title of "Shift Supervisor" (SS) to "Shift Operations Supervisor" (SOS) in various locations in the TS, and in Operating License Items 2.C.(23).A and 2.C.(16).a. for Units 1 and 2 respectively. This change would reflect the current title for the individual that is responsible for control room command as shown in the Sequoyah organization chart and the Updated Final Safety Analysis Report. In addition, the licensee proposed changing the title of the Senior Vice President, Nuclear Group, in Section 6.2.1.b, to Senior Vice President, Nuclear Power, to be consistent with the TVA organization chart and other locations in the TS. The licensee also proposed changing the title of "Operational Quality Assurance Program" to "Nuclear Quality Assurance Program" to provide consistency with the program title in the TVA Nuclear Quality Assurance Manual. The staff

finds these changes acceptable since they do not result in a change to the structure of the organization or responsibilities of the individuals.

The proposed change to move the requirement for implementation of the Quality Assurance Program for environmental monitoring from Section 6.8.4.b to Section 6.8.1.h moves the responsibility for maintaining a Quality Assurance Program for environmental monitoring from Radiological Control to organizations within the TVA Nuclear Power organization at the site. In this way the program is controlled in a similar manner as other Sequoyah site activities using the independent qualified reviewer process. According to the licensee, these procedures no longer require specific Radiological Control responsibilities because the coordination with organizations outside of Nuclear Power is not required for the implementation of the Quality Assurance Program procedures on environmental monitoring. Also, the review process for changes to these procedures by organizations outside of TVA Nuclear Power does not need to be coordinated through the offsite Radiological Control organization. The staff finds this change acceptable since the procedural requirements will continue to be adequately controlled to ensure the quality assurance attributes and maintain plant nuclear safety.

Other related TS changes have been proposed, such as changes to the index and wording changes, that are necessary to implement the changes described above. They are administrative in nature and, therefore, acceptable.

The changes described above do not result in any changes to plant equipment, design, setpoints, or operating practices. The administrative controls implemented by the proposed changes continue to provide adequate requirements to ensure plant nuclear safety. Therefore, the staff finds the changes acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Tennessee State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments involve changes with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and in administrative procedures or requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (59 FR 4948). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: March 31, 1994