



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

ENCLOSURE 3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 148 TO FACILITY OPERATING LICENSE NO. DPR-77
AND AMENDMENT NO. 134 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 letter dated March 9, 1990, the Tennessee Valley Authority (TVA) proposed changes to the Technical Specifications (TSs) for the Sequoyah Nuclear Plant (SQN), Units 1 and 2. TVA stated that the proposed changes implement NRC's recommended alternative for the Radiological Effluent Technical Specifications (RETS) as contained in Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program."

Generic Letter (GL) 89-01 which was issued on January 31, 1989, resulted from the NRC staff examining the contents of the RETS in relation to the Commission's Interim Policy Statement on Technical Specification Improvements. The staff had determined that programmatic controls can be implemented in the Administrative Controls section of the TS to satisfy existing regulatory requirements for RETS. At the same time, the procedural details of the current TSs on radioactive effluents and radiological environmental monitoring can be relocated to the Offsite Dose Calculation Manual (ODCM). Likewise, the procedural details of the current TSs on solid radioactive wastes can be relocated to the Process Control Program (PCP). These actions which the staff concluded simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and are provided as a line-item improvement of the TSs, consistent with the goals of the Policy Statement.

2.0 DISCUSSION

TVA followed the guidance provided in GL 89-01 as shown in Table 1. The proposed amendments would: (1) incorporate programmatic controls in the Administrative Controls Section of the TS that satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a and Appendix I to 10 CFR Part 50; (2) relocate the existing procedural details in current specifications involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents equipment requirements for liquid and gaseous

effluents, radiological environmental monitoring, and radiological reporting details from the TSs to the ODCM; (3) relocate the definition of solidification and existing procedural details in the current specification on solid radioactive wastes from the TSs to the PCP; (4) simplify the associated reporting requirements in the TSs; (5) simplify the administrative controls for changes to the ODCM and PCP; (6) add record retention requirements for changes to the ODCM and PCP in these two documents; (7) update the definitions of the ODCM and PCP consistent with these changes.

In addition, TVA proposed to relocate the definition for a source check from the TSs to the ODCM. The definition of a source check is not being changed. The GL was mute on the subject of a source check.

TVA also proposed an addition to TS Section 6.10.2 specifying that records of reviews performed for changes made to the ODCM and PCP be retained along with other similar records of administrative activities for the duration of the operating license. The GL does not address this issue. TS Section 6.10 contains requirements for retention of records of fifteen other administrative functions.

3.0 EVALUATION

Table 1 of this evaluation has been prepared to summarize TVA's proposed actions in the implementation of GL 89-01. TVA's implementation complies with GL 89-01 guidance except for the relocation of the definition of source check, the addition to Section 6.10.2, and retaining the procedure for reporting major changes in the radwaste treatment systems in the TSs. SQN's license amendment request to implement GL 89-01 includes (1) the incorporation of programmatic controls for radioactive effluents and radiological environmental monitoring in the administrative controls section of the TS, (2) incorporation of the procedural details of the current RETS in the ODCM and PCP as appropriate, and (3) confirmation that the guidance of the GL has been followed. Therefore, based on Table 1, the staff finds this TS amendment request has met the guidance of GL 89-01, and is, therefore, acceptable.

The definition of source check is relocated to Paragraph 6.12 in the "Definitions" section of the ODCM. The staff finds this change is acceptable. TVA elected to add to the Technical Administrative Controls, Section 6.10.2. The specific addition requires that records of review performed for changes made to the ODCM and PCP shall be retained for the duration of the unit operating license. Section 6.10.2 contains similar retention requirements for records of fifteen other categories of records. The staff finds that this addition to Section 6.10.2 of the TSs is acceptable.

TVA has retained in TS Section 6.15 the existing requirement for reporting major changes to Radioactive Waste Treatment Systems (i.e., liquid, gaseous and solid). GL 89-01 lists that reporting major changes to these systems as "existing procedural details which are relocated to the ODCM or PCP as appropriate." TVA has also elected to incorporate into Section 6.11 of the PCP the same TS requirement for major changes to liquid, gaseous and solid Radioactive Waste Treatment Systems. The change requirements located in the TS obviate the need for such requirements to be located elsewhere. The staff finds acceptable TVA's retaining in its TSs the existing requirements for reporting changes to Radioactive Waste Treatment Systems.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The amendments also relate to changes in recordkeeping, reporting, or administrative procedures or requirements. The 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 these amendments involve no significant hazards consideration and there has been no public comment on such finding. 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 nor environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (55 FR 12601) on April 4, 1990 and consulted with the State of Tennessee. No public comments were received and the State of Tennessee did not have any comments.

The staff 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, and (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 nor to the health and safety of the public.

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Dated: November 16, 1990

Enclosure: Table 1

TABLE 1
 LINE-ITEM DESCRIPTION OF TVA'S PROPOSED TS CHANGE 90-03

<u>Specification</u>	<u>Title</u>	<u>Description of Change</u>	<u>Implementation</u>
i.17	Offsite Dose Calculation Manual (ODCM)	Expand definition to incorporate model TSs provided in GL 89-01.	Note 1
1.22	Process Control Program (PCP)	Update definition to incorporate model TSs provided in GL 89-01.	Note 1
1.31	Solidification	Definition is relocated to the PCP.	Note 1
1.32	Source Check	Definition is relocated to the ODCM.	TVA elected to relocate this definition.
3.3.3.9 and 4.3.3.9	Radioactive Liquid Effluent Monitoring Instrumentation	Programmatic controls are included in TS 6.8.5f (Item 1). Existing TS details are relocated to the ODCM.	Note 1
3.3.3.10 and 4.3.3.10	Radioactive Gaseous Effluent Monitoring Instrumentation	Programmatic controls are included in TS 6.8.5f (Item 1). Existing TS details for radioactive gaseous effluent monitoring instrumentation are relocated to the ODCM. TSs 3.3.3.10 and 4.3.3.10 have been revised to retain explosive gas monitoring instrumentation requirements.	
3/4.11 3/4.11.1	Radioactive Effluents Liquid Effluents Concentration	Programmatic controls are included in TS 6.8.5f (Items 2 and 3). Existing TS details are relocated to the ODCM.	Note 1

Note 1 - Complies with GL 89-01 Guidance

<u>Specification</u>	<u>Title</u>	<u>Description of Change</u>	<u>Implementation</u>
3.11.1.2 and 4.11.1.2	Radioactive Effluents: Dose	Programmatic controls are included in TS 6.8.5f (Items 4 and 5). Existing TS details are relocated to the ODCM.	Note 1
3.11.1.3 and 4.11.1.3.1	Radioactive Effluents: Liquid Waste Treatment	Programmatic controls are included in TS 6.8.5f (Item 6). Existing TS details are relocated to the ODCM.	Note 1
3.11.1.4 and 4.11.1.4	Radioactive Effluents: Liquid Holdup Tanks	Existing TS requirements are retained	Note 1
3.11.2.1, 4.11.2.1.1, and 4.11.2.1.2	Radioactive Effluents Gaseous Effluents: Dose Rate	Programmatic controls are included in TS 6.8.5f (Items 3 and 7). Existing TS details are relocated to the ODCM.	Note 1
3.11.2.2 and 4.11.2.2	Radioactive Effluents: Dose-Noble Gases	Programmatic controls are included in TS 6.8.5f (Items 5 and 8). Existing TS details are relocated to the ODCM.	Note 1
3.11.2.3 and 4.11.2.3	Radioactive Effluents: Dose-I-131, I-133, Tritium, and Radionuclides in Particulate Form	Programmatic controls are included in TS 6.8.5f (Items 5 and 9). Existing TS details are relocated to the ODCM.	Note 1
3.11.2.4 and 4.11.2.4.1	Radioactive Effluents: Gaseous Radwaste Treatment	Programmatic controls are included in TS 6.8.5f (Item 6). Existing TS details are relocated to the ODCM.	Note 1
3.11.2.5 and 4.11.2.5	Radioactive Effluents: Explosive Gas Mixture	Existing TS requirements are retained.	Note 1

<u>Specification</u>	<u>Title</u>	<u>Description of Change</u>	<u>Implementation</u>
3.11.2.6 and 4.11.2.6	Radioactive Effluents: Gas Decay Tanks	Existing TS requirements are retained.	Note 1
3.11.3 and 4.11.3.1	Radioactive Effluents: Solid Radioactive Waste	Existing TS details are relocated to the PCP.	Note 1
3.11.4 and 4.11.4	Radioactive Effluents: Total Dose	Programmatic controls are included in TS 6.8.5f (Item 10). Existing TS details are relocated to the ODCM.	Note 1
3.12.1 and 4.12.1	Radioactive Environmental Monitoring: Monitoring Program	Programmatic controls are included in TS 6.8.5g (Item 1). Existing TS details are relocated to the ODCM.	Note 1
3.12.2 and 4.12.2	Radioactive Environmental Monitoring: Land Use Census	Programmatic controls are included in TS 6.8.5g (Item 2). Existing TS details are relocated to the ODCM.	Note 1
3.12.3 and 4.12.3	Radioactive Environmental Monitoring: Interlaboratory Comparison Program	Programmatic controls are included in TS 6.8.5g (Item 3). Existing TS details are relocated to the ODCM.	Note 1
6.8.4(c)	Procedures and Programs: Written Procedures	Table 6.1-1 previously contained surveillance requirements and environmental monitoring requirements. Table 6.1-1 was removed under a previous TS amendment and is no longer applicable. TS 6.8.4(c) was inadvertently retained and is now being deleted.	Note 1
6.9.1.6 and 6.9.1.7	Reporting Requirements: Annual Radiological Environmental Operating Report	Existing reporting details of TS 6.9.1.7 are relocated to the ODCM. Reporting requirements are simplified and consolidated under TS 6.9.1.6.	Note 1

<u>Specification</u>	<u>Title</u>	<u>Description of Change</u>	<u>Implementation</u>
6.9.1.8 and 6.9.1.9	Reporting Requirements: Semiannual Radioactive Effluent Release Report	Existing reporting details of TS 6.9.1.9 are relocated to the ODCM and PCP as appropriate. Reporting requirements are simplified and consolidated under TS 6.9.1.8.	Note 1
6.10.2(p)	Record Retention	A requirement for retaining records of reviews performed for changes to the ODCM and the PCP has been added to Section 6.10.	TVA elected to add this item to Section 6.10.2 dealing with record retention
6.13	Process Control Program (PCP)	Existing TS requirements are simplified to incorporate model TSs provided in GL 89-01.	Note 1
6.14	Office Dose Calculation Manual (ODCM)	Existing TS requirements are simplified to incorporate model TSs provided in GL 89-01.	Note 1
6.15	Major Changes to Radioactive Waste Treatment Systems (Liquid, Gaseous, and Solid)	Existing TS requirements are retained.	TVA elected to retain existing TS require- ments and incorporat in the PCP, licensee initiated changes to liquid, gaseous and solid radioactive waste systems.