



Tennessee Valley Authority, 117 North Market Street, Chattanooga, Tennessee 37402

FEB 25 1991

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

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

SEQUOYAH NUCLEAR PLANT (SQN) - TVA POSITION REGARDING TECHNICAL
SPECIFICATION (TS) 3.0.4 AND GENERIC LETTER (GL) 87-09 (TAC NO. 99917S1)

- References:
1. NRC letter to TVA dated September 21, 1990, "Provisions of 3.0.4 Deleted From LCO 3.9.2, Source Range Neutron Flux Monitors (TAC NOS. 77172/77173) (TS 90-15) - Sequoyah Nuclear Plant, Units 1 and 2"
 2. TVA letter to NRC dated November 15, 1988, "Sequoyah Nuclear Plant (SQN) - TVA Position Regarding Technical Specification (TS) 3.0.4 and Generic Letter (GL) 87-09"

By Reference 1 NRC requested that TVA reconsider the position previously taken by Reference 2 with respect to implementation of the GL 87-09 version of TS 3.0.4. This request was a result of the TS 90-15 amendment to incorporate an exception to TS 3.0.4 in the Action Statement to Limiting Conditions for Operation (LCO) 3.9.2 on source range neutron flux monitors for refueling operations. If a TS change to implement the GL 87-09 version of TS 3.0.4 had been previously processed, there would not have been a need for TS 90-15.

TVA has reevaluated its position provided in Reference 2 in review with the Operations organization and has concluded that at this time, we still do not consider the implementation of the GL 87-09 version of TS 3.0.4 a safety enhancement. While it is agreed that the GL 87-09 version of TS 3.0.4 would have negated the need to process TS 90-15, there is still a concern that in the broader sense, the GL 87-09 version of TS 3.0.4 reduces LCO clarity from a human factors standpoint when the requirement exceptions are removed from the individual specifications; this accordingly could introduce uncertainty in interpretation and application. In conclusion, the value of the change is not currently considered to offset the drawbacks of implementation.

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Additionally, there may be some cases where applicability may not be prudent even if allowable under the GL 87-09 requirements. An example would be the application of the guidance to LCO 3.9.8.2, which allows, with action, continued operation in the mode or condition if two residual heat removal (RHR) loops are not operable and vessel water level is less than 23 feet above the top of the reactor vessel flange. The GL 87-09 version of 3.0.4 would allow entry into Mode 6 with less than 2 RHR loops operable with vessel water level less than 23 feet above the top of the reactor vessel flange or reduction of water level to less than 23 feet while in Mode 6 without two RHR loops operable. Although allowable under the GL 87-09 requirements, these actions may not be considered to be consistent with the intent of the specification or prudent operation. Conversely, instances may exist in the current version of SQN's TSs where the TS 3.0.4 guidance of GL 87-09 could be prudently and clearly applied. In that regard, as a part of SQN's ongoing efforts for line item improvements in the TSs, TVA will continue to factor in guidance of the GL 87-09, as appropriate.

It is further noted that the NRC TS Improvement Program (TSIP) may be applying TS 3.0.4 exceptions in a somewhat different method than that currently proposed by GL 87-09. This method of implementation, with its human factors considerations, may be a viable option for TVA in the future. TVA will continue to monitor implementation of TS 3.0.4 in the TSIP and evaluate this implementation for future TS improvements.

There are no commitments made in this submittal. Please direct questions concerning this issue to J.D. Smith at (615) 843-6672.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

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cc: See page 3

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