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Ken Powers
Vice President, Sequoyah Nuclear Plant

June 9, 1994

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) - FIRE PROTECTION IMPROVEMENT PLAN PERIODIC STATUS REPORT

A working meeting between TVA and NRC was held at SQN on August 19, 1991, to discuss the self-identified problems in SQN's Fire Protection Program and the improvement plan efforts initiated by TVA. As a result of this meeting, TVA agreed to submit periodic status reports to inform NRC on the progress of efforts made in conjunction with the improvement plan.

The most recent status report identifying progress achieved and areas needing further action is included in the enclosure.

The original targeted completion date for activities specified in the Fire Protection Improvement Plan was set for December 1, 1994. However, because of the impact of the two-unit outage involving erosion and corrosion problems and the associated engineering evaluations, the delay in the compilation of documentation and issuance of the Fire Protection Report supports a change of this commitment. Additionally, the original approach to the issuance of the Fire Protection Report has been modified (refer to Item 4-3 in the enclosure). Therefore, SQN is revising the commitment date to complete the four phases of the Fire Protection Improvement Plan to December 1, 1995.

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If you have any questions concerning this submittal, please telephone
C. H. Whittemore at (615) 843-7210.

Sincerely,



Ken Powers

Enclosure

cc (Enclosure):

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ENCLOSURE

FIRE PROTECTION IMPROVEMENT PLAN - STATUS FOR PERIOD ENDING MAY 1, 1994

Phase I - Phase I is Complete

Phase II - Phase II is Complete

Phase III - Phase III is Complete

Phase IV - Targeted Completion Date December 1, 1995

- 4-1 Perform an independent fire protection assessment to assess that the actions taken in Phase III are properly implemented and effective.

Status: This item has been completed by the corporate Fire Protection Services group. The results of the assessment concluded that, of the 10 Phase III items, 9 items were found to be acceptable or were rescheduled to Phase IV, and 1 item was found to need additional attention. The one item that needed additional attention involved the enhancement of site procedures to require fire protection expertise involvement in the design-review process. A problem evaluation report (SQ940019) has been initiated to provide the necessary attention to complete the one item and track the corrective action to its completion. The completion date for the corrective action is scheduled for June 1, 1994.

- 4-2 This item was previously rescheduled and completed during Phase III (refer to Item 3-8).

- 4-3 Issue the remaining updated design documentation to support the final compilation into the SQN Fire Protection Report and establish a process to maintain the documentation current.

Status: Preliminary work is continuing. However, as a result of initial reviews, the approach for accomplishing this item has been modified. Based on this revised approach, the completion of this item should be deferred until 1995. This deferral is based on the following:

1. TVA feels that in order to facilitate the review of the Fire Protection Report, the design basis documentation (i.e., design input/output and docketed information) for the Fire Protection Program should be simplified. It is proposed that submittals documenting TVA's level of compliance with the various aspects of NRC's Branch Technical Position 9.5.1 and 10 CFR 50, Appendix R be summarized in one submittal to the NRC and that NRC provide one Safety Evaluation Report concurring with those positions. This approach would simplify the review and approval process for the Fire Protection Report.
2. Lessons learned from the Watts Bar Fire Protection Report could be incorporated into the initial preparation of the Sequoyah Fire Protection Report, thus further minimizing the possibility of additional review time by NRC.

This approach would allow the resolution of any outstanding issues before the review of the Fire Protection Report. It would also allow for the logical progression through documentation review; design input/output updates, if necessary; and finally, compilation into the Fire Protection Report. The Fire Protection Report is expected to be submitted by December 1995.

4-4 Issue a design package for Project Control No. (PCN) 607.

Status: As a result of impacts encountered because of the restart efforts and reallocation of TVA resources, this item is only 30 percent complete. At the current time, the overall impact of these factors is being evaluated. One possible impact is that the October 1, 1994, completion date for this project will not be met. However, the delay in the completion of the project is not expected to be significant.

4-5 Perform a life-cycle analysis on high-pressure fire protection components and provide replacement recommendations.

Status: This item will be accomplished in conjunction with the upgrade to the fire protection system within the scope of PCN 607 (refer to Item 4-4). In the new design of the system, consideration will be given to components that may be near their design-life limit. It is not anticipated that any components will require replacement.