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June 7, 1994

U.S. Nuclear Regulatory Commission
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Gentlemen:

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

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - COMMITMENT STATUS AND
JUSTIFICATION FOR IMPLEMENTATION OF THE STATION BLACKOUT (SBO) RULE
(10 CFR 50.63) (TAC NOS. M68603 AND M68604)

- References:
1. NRC letter to TVA dated June 11, 1992, "Supplemental Safety Evaluation (SSE) - Station Blackout Analysis, Sequoyah Nuclear Plant Units 1 and 2 (TAC Nos. M68603 and M68604)"
 2. TVA letter to NRC dated April 16, 1992, "Sequoyah Nuclear Plant (SQN) - Units 1 and 2 - Response to NRC Safety Evaluation (SE) on the Conformance With the Station Blackout (SBO) Rule (10 CFR 50.63)"

The purpose of this letter is to provide NRC with the current status and justification for implementing SQN SBO commitments (reference 10 CFR 50.63, paragraph [c][4]). By Reference 2, TVA provided NRC with the schedule for completing remaining SBO commitments. While three of the five commitments have been completed, the Unit 1 and Unit 2 commitments to install new fail-open level control valves on the turbine-driven auxiliary feedwater (AFW) pump are scheduled for completion prior to restart from the Unit 1 Cycle 7 and the Unit 2 Cycle 6 refueling outages, respectively. In Reference 1, NRC acknowledged and accepted this schedule with the understanding that the Unit 1 Cycle 7 refueling outage would exceed the preferred two-year implementation period for SBO actions, while the Unit 2 Cycle 6 refueling outage was expected to occur within the two-year implementation period.

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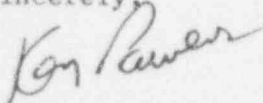
SNR has experienced extended forced outages affecting Units 1 and 2 since the exchange of the referenced letters. These forced outages have in no way altered TVA's commitment to carry out the remaining SBO commitments; however, the duration of these outages has pushed the timing for commitment completion further beyond the preferred two-year SBO implementation period. The Unit 1 commitment was previously expected to exceed the two-year milestone of June 15, 1994, by approximately four months; however, a projected Unit 1 Cycle 7 outage date of September 1995 means that Unit 1 commitment completion could occur approximately 15 months beyond the two-year milestone. In addition, the Unit 2 Cycle 6 refueling outage, presently scheduled for July 1994, means that the Unit 2 commitment completion will exceed the June 15, 1994, date by approximately three months.

The extended forced outages affecting both Units 1 and 2 were of a nature and scope that precluded TVA from carrying out its remaining SBO commitments. The outages were completely unforeseen, occurring without sufficient warning and without adequate knowledge of required outage duration to pursue the modifications. Moreover, even if TVA had been able to foresee the duration of the forced outages with any reasonable certainty, the critical activities that were necessary to return the units to power operation would have taken precedence over the planning and procurement activities necessary to provide for the early implementation of the SBO commitments.

SNR has initiated compensatory measures to ensure that the Operations staff has sufficient manpower to manually operate the AFW level control valves during accident conditions. These compensatory measures will provide local AFW level control valve operation to maintain acceptable steam generator levels throughout the postulated four-hour SBO duration. These measures will be maintained until the modifications have been completed on the valves that will provide remote operation capabilities for the postulated SBO event duration.

There are no new commitments contained in this submittal. Please direct questions concerning this issue to K. C. Weller at (615) 843-7527.

Sincerely,



Ken Powers

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