ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

TVA-SQN-TS-44

CHANGE IN THE SURVEILLANCE REQUIREMENT, 4.8.1.1.2.d.11, FOR THE DIESEL GENERATOR

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 8. Verifying the diesel generator operates for at least 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to greater than or equal to 4400 kw and during the remaining 22 hours of this test, the diesel generator shall be loaded to greater than or equal to 4000 kw. The generator voltage and frequency shall be 6900 \pm 690 volts and 60 \pm 1.2 Hz within 10 seconds after the start signal; the steady state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24 hour test, perform Specification 4.8.1.1.2.d.4.b
- Verifying that the auto-connected loads to each diesel generator do not exceed the 2000 hour rating of 4000 kw.
- 10. Verifying the diesel generator's capability ta:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power.
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its shutdown status.

- 11. Verifying that the automatic load sequence timers are OPERABLE with the setpoint for each sequence timer within ± 5 percent of its design setpoint.
- 12. Verifying that the following diesel generator lockout features prevent diesel generator starting only when required:
 - a) Engine overspeed
 - b) 86 GA lockout relay
- e. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting the diesel generators simultaneously, during shutdown, and verifying that the diesel generators accelerate to at least 900 rpm in less than or equal to 10 seconds.

SURVEILLANCE REQUIREMENTS (Continued)

Within 5 minutes after completing this 24 hour test, perform Specification 4.8.1.1.2.c.4. The generator voltage and frequency shall be 6900 \pm 690 volts and 60 \pm 1.2 Hz within 10 seconds after the start signal; the steady state generator voltage and frequency shall be maintained within these limits during this test.

- Verifying that the auto-connected loads to each diesel generator do not exceed the 2000 hour rating of 4000 kw.
- 10. Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power.
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its shutdown status.
- 11. Verifying that the automatic load sequence timers are OPERABLE with the setpoint for each sequence timer within * 5 percent of its design setpoint.
- 12. Verifying that the following diesel generator lockout features prevent diesel generator starting only when required:
 - a) Engine overspeed
 - b) 86 GA lockout relay
- e. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting the diesel generators simultaneously, during shutdown, and verifying that the diesel generators accelerate to at least 900 rpm in less than or equal to 10 seconds.
- 7. At least once per 10 years# by:
 - Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypoclorite solution, and
 - Performing a pressure test of those portions of the diesel fuel oil system design to Section III, subsection ND of the ASME Code at a test pressure equal to 110 percent of the system design pressure.

^{*}These requirements are waived for the initial surveillance.

JUSTIFICATION FOR PROPOSED TECHNICAL SPECIFICATION CHANGE TVA-SQN-TS-44 SEQUOYAH NUCLEAR PLANT

The proposed change deletes the surveillance requirement 4.8.1.1.2.d.11 for the diesel generator in order to reflect the actual as designed logic which adequately protects the diesel generator from a sustained overcurrent condition when in parallel with offsite power. This change is also intended to resolve the discrepancy documented by the NRC-OIE Region II in Inspection Report 50-327/82-36 and 50-328/82-35 dated February 2, 1983.

The probability of an occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased by deleting surveillance instruction 4.8.1.1.2.d,11. This instruction requires the diesel generators (D/G), while in the test mode (parallel to offsite power), to have the ability to return to standby when a safety injection signal (SIS) is initiated. Sequoyah was not designed to incorporate this function. Further, Regulatory Guide 1.108, Revision 1, August 1977, does not require the D/G to return to standby when an SIS is initiated. For Sequoyah, instantaneous overcurrent relays have been installed on the D/G bus to prevent overload when the normal or alternate feeder breaker is closed. It is believed that this is sufficient protection from an overload condition should there be a simultaneous SIS and blackout (BO) when the diesel is in parallel with offsite power. Load shedding and sequential loading of the shutdown boards will occur subsequently to the SIS and BO. This overcurrent situation is also defined in Chapter 8 of the FSAR (Diesel Generator Operational Testing).

For the above reasons, it is also believed that the possibility of an unanalyzed accident or malfunction has not been created, nor has the margin of safety in the technical specifications been reduced.