



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 208 TO FACILITY OPERATING LICENSE NO. DPR-77
AND AMENDMENT NO. 198 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 April 6, 1995, the Tennessee Valley Authority (the licensee) requested changes to the Technical Specifications (TS) for the Sequoyah Nuclear Plant (SQN) Units 1 and 2. The TS changes relate to inservice inspection (ISI) and inservice testing (IST) requirements which are specified in Section 50.55a, "Codes and Standards," of Title 10 of the Code of Federal Regulations (10 CFR).

The American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (the code) is incorporated by reference as the requirements for ISI and IST (as specified in Section XI of the Code). The proposed changes would revise TS surveillance requirement (SR) 4.0.5 in accordance with the recommendations of NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," and NUREG-1431, "Standard Technical Specifications" (STS). The proposed changes would also relocate TS 3/4.4.10, "Structural Integrity," in accordance with the Commission's Final Policy Statement for relocation of current TS that do not meet the screening criteria for retention.

2.0 BACKGROUND

The Commission's Final Policy Statement on TS improvements defines the scope of the TS and provides the criteria for technical design items to be included in, or relocated out of, the TS document. On July 19, 1995 (60 FR 36953) the NRC published the final rule governing the implementation of this policy via a revision of 10 CFR 50.36, "Technical Specifications," which is to become effective August 18, 1995.

The April 7, 1995, revised version of the STS (NUREG-1431, Rev.1), relocated the IST requirements to the administrative controls section of the TS and deleted a portion of the ISI requirements, retaining the reactor coolant pump (RCP) flywheel inspections in the administrative control section. NUREG-1482, Chapter 6, recommended that licensee's revise their TS to incorporate the revised STS for IST programs.

ENCLOSURE 3

The current 10-year interval for the SQN IST program began July 1, 1981, for Unit 1 and June 1, 1982, for Unit 2. However, due to extended shutdown periods the program was extended as allowed by Section XI of the ASME Code. The current IST program for Unit 1 is based on the requirements of the 1974 Edition through Summer 1975 Addenda of the ASME Code. The current IST program for Unit 2 is based on the requirements of the 1977 Edition through Summer 1978 Addenda of the ASME Code.

The current ISI program for SQN Units 1 and 2 is based on the 1977 Edition through Summer 1978 Addenda of the ASME Code. The 10-year interval for ISI has also been extended due to the extended shutdown periods of the two units.

On July 26, 1995, during a conference call, the licensee stated that the Second 10-year interval programs for both ISI and IST for SQN Units 1 and 2 would begin on December 15, 1995, with both programs based on the requirements of the 1989 Edition of the ASME Code. The TS change will allow the licensee a period of 12 months from the beginning of the interval to identify, submit, and obtain approval of relief requests for impractical code requirements in accordance with 10 CFR 50.55a, paragraphs (f)(5) and (g)(5), for IST and ISI respectively.

3.0 EVALUATION

The licensee's proposed change revises the ISI and IST commitments in the TS, incorporating the recommended STS verbiage. The licensee also deletes section 3/4.4.10, "Structural Integrity," from the Reactor Coolant System chapter.

3.1 Proposed change, SR 4.0.5

- 3.1.1 The revised version of SR 4.0.5 divides the TS into ISI and IST requirements and incorporates a format change which defines a new surveillance frequency for IST (i.e., "Biennially or every 2 years" - at least once per 731 days). This change is editorial in nature and the staff finds it consistent with the STSs. Therefore, the revision is acceptable.
- 3.1.2 The new IST TS requirements also address failure to perform SRs in the allowable interval. This is considered a TS improvement that provides guidance for failure to perform IST within the allowed surveillance interval. Therefore, the revision is acceptable.
- 3.1.3 The revised IST requirement deletes the reference to snubbers as the testing and inspection requirements are outlined in TS 3/4.7.9. This change is acceptable since the component testing and inspection requirements are found in another section of the TS.
- 3.1.4 The licensee also proposed a revision to the Bases of SR 4.0.5, deleting the sentence requiring written relief from the Commission under all ISI and IST testing deviations. TVA based this revision on the guidance of the draft NUREG-1482; however, subsequent revisions have incorporated guidance regarding relief

from the Commission. If an impracticality is determined within the initial interval or within the first 12 months of a new interval, the licensee follows the requirements in 10 CFR 50.55a(f)(5)(iii) and (iv) or (g)(5)(iii) and (iv). If an impractical requirement is identified during subsequent intervals and not within the first 12 months, the licensee must meet the requirements of 10 CFR 50.55a(f)(5)(iii) or (g)(5)(iii), notify the Commission, submit the information supporting the determination of impracticality and obtain NRC's approval pursuant to (f)(6)(i) or (g)(6)(i), prior to the time that the next test or inspection is required. However, the specification does not allow the licensee to implement alternative testing under paragraphs 50.55a (a)(3)(i) and (ii) until authorized by the Director of the Office of Nuclear Reactor Regulation.

These changes to the licensee's TS are consistent with the intent of the revised STS and the regulatory guidance in NUREG-1482. The ISI and IST requirements are given in 10 CFR 50.55a which the licensee documents via its 10 year interval program requirements. The change is acceptable since the regulatory requirements are delineated in 10 CFR 50.55a and the items remaining in the TS serve to clarify the more restrictive operability requirements maintained by the licensee and provide consistency in surveillance intervals throughout the TS. The change eliminates inconsistencies between the TS and the regulations.

3.2 RELOCATION OF TS 3/4.4.10. "STRUCTURAL INTEGRITY"

The licensee proposed removal of Section 3/4.4.10 from the TS and relocated the associated SR 4.4.10 to the ISI requirements in SR 4.0.5. SR 4.4.10 requires inspection of the Reactor Coolant Pump Flywheel. The revised STS have also removed these requirements from the Reactor Coolant System chapter and relocated the SR regarding the reactor coolant pump flywheel to the administrative controls section of the STS. The licensee has instead relocated this SR to the ISI requirements in SR 4.0.5 since it precludes revising 15 to 20 other references to SR 4.0.5 that are located throughout the SQN TS.

As indicated in the final policy statement (10 CFR 50.36), many requirements may be removed from TS and controlled by other documents. The NRC has determined that the action statements for structural integrity can be removed from TS and put in a controlled document. TVA indicates that these items are included in its ISI program document and covered by SR 4.0.5. The RCP flywheel examination SR is retained because it is not covered under 10 CFR 50.55a requirements, but it may be relocated to SR 4.0.5 for administration of the exam.

The changes proposed by the licensee are acceptable based on the regulatory guidance provided in 10 CFR 50.36, NUREG-1482 and NUREG-1431. The revised TS are consistent with the STS and maintain an acceptable level of quality and safety.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Tennessee State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and surveillance requirements. The NRC staff has determined that the amendment involves 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 20528). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: August 22, 1995

AMENDMENT NO. 208 FOR SEQUOYAH UNIT NO. 1 - DOCKET NO. 50-327 and
AMENDMENT NO. 198 FOR SEQUOYAH UNIT NO. 2 - DOCKET NO. 50-328
DATED: August 22, 1995

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Docket Files

PUBLIC

SN Reading File

S. Varga

0-14-E-4

G. Hill

T-5-C-3(2 per docket)

C. Grimes

0-11-E-22

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