SEQUOYAH . 9601160227 9DR ADOCK										
- UNIT	FUN	ICTION	IAL U	INIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TES7	MODES FOR WHICH SURVEILLANCE IS REQUIRED		
1 0227 074	3.	. CONTAINMENT ISOLATION								
		a.	Pha	ise "A" Isolation					1.194.12	
			1)	Manual	N.A.	N. A.	R	1, 2, 3, 4	1. 2.2. 3	
			2)	From Safety Injection Automatic Actuation Logic	N. A.	N. A.	M(1)	1, 2, 3, 4	R51	
		b.	Pha	ise "B" Isolation						
3/			1)	Manua1	N.A.	N.A.	R	1, 2, 3, 4		
4 3-			2)	Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3, 4		
-35			3)	Containment Pressure High-High	S	R	Q	1, 2, 3		
		с.	Cor	tainment Ventilation Isolat	ion					
			1)	Manual	N.A.	N.A.	R	1, 2, 3, 4	R51	
			2)	Automatic Isolation Logic	N.A.	N. A.	M(1)	1, 2, 3, 4		
Ame Jun			3)	Containment Purge Air Exhaust Monitor Radio- activity-High	S	R	79	1, 2, 3, 4	R172	

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SEQUOYAH		RADIATION MONITORING	INSTRUMENTA	TION SURVEILLANCE	REQUIREMENTS		
	INST	TRUMENT	CHANNEL	CHANNEL	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED	R116
UNIT	1.	AREA MONITOR					R116
1		a. Fuel Storage Pool Area	S	R	* 93	*	- 64
	2.	PROCESS MONITORS					R116
		a. Containment Purge Air Exhaust	S	R	* 5	7 1, 2, 3, 4 & 6	
		b. Containment					
3/4 3-42		i. Gaseous Activity RCS Leakage Detection	S	R	* 9	1, 2, 3, & 4	
42		ii. Particulate Activity					
		RCS Leakage Detection	S	R	* (9)	1, 2, 3 & 4	
		c. Control Room Isolation	S	R	# (3)	ALL MODES	

TABLE 4.3-3

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*With fuel in the storage pool or building.

R116

R172

R17

TABLE 4.3-2 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUN	OITS	IAL I	JNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED	
3.	CON	TAIN	MENT ISOLATION					
	a.	Pha	ase "A" Isolation					
		1)	Manual	N.A.	N. A.	R	1, 2, 3, 4	
		2)	From Safety Injection Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3, 4	R39
	b.	Pha	ise "B" Isolation					
		1)	Manual	N.A.	N. A.	R	1, 2, 3, 4	
		2)	Automatic Actuation Logic	N.A.	N.A.	M(1)	1, 2, 3, 4	
		3)	Containment Pressure High-High	S	R	Q	1, 2, 3	
	с.	Con	tainment Ventilation Isolat	ion				
		1)	Manual	N.A.	N.A.	R	1, 2, 3, 4	R39
		2)	Automatic Isolation Logic	N.A.	N. A.	M(1)	1, 2, 3, 4	
		3)	Containment Purge Air Exhaust Monitor Radio- activity-High	S	R	1 50	1, 2, 3, 4	R158



3/4 3-35

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RADIATION M	DNITORING INSTRUMENT	ATION SURVEILLANCE	REQUIREMENTS	
INSTRUMENT 1. AREA MONITOR	CHANNEL CHECK	CHANNEL	CHANNEL FUNCTIONAL TEST	MODES FOR WHICH SURVEILLANCE IS REQUIRED
a. Fuel Storage Pool Area	S	R	* @	*
2. PROCESS MONITORS				R102
a. Containment Purge Air Exha	ust S	R	+ (P)	1, 2, 3, 4 & 6
b. Containment				
i. Gaseous Activity			3	
RCS Leakage Detection ii. Particulate Activity		R	# 59	1, 2, 3, & 4
RCS Leakage Detection		R	# (2)	1, 2, 3 & 4
c. Control Room Isolation	S	R	+ ~	ALL MODES
			(29)	R102

*With fuel in the storage pool or building.

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ENCIOSURE 2 PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2 DOCKET NOS. 50-327 AND 50-328 (TVA-SQN-TS-95-22)

DESCRIPTION AND JUSTIFICATION FOR THE RADIATION MONITORING INSTRUMENTATION SURVEILLANCE FREQUENCY REVISION

Description of Change

TVA proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 technical specifications (TSs) to extend the testing interval of Item 3.c.3 in Table 4.3-2 for Surveillance Requirement (SR) 4.3.2.1.1 from monthly to quarterly. The same extension applies to Table 4.3-3 for SR 4.3.3.1. As described in the below justification, this proposed change is consistent with the guidance provided in Generic Letter (GL) 93-05.

Reason for Change

The functional testing of the radiation monitoring instrumentation is labor intensive. Presently, 12 radiation monitors must be functionally tested on a monthly basis. It is estimated that these monitors are out of service approximately six hours for each test. By extending the test period from monthly to quarterly, the monitors would have an increased availability and manpower requirements decreased by 66 percent. The estimated savings to SQN is approximately \$1,008,000 over the life of the plant.

Justification for Changes

The spent fuel pit radiation monitors, containment building purge monitors, and main control room radiation monitors are safety-related radiation monitors designed to isolate the auxiliary building, containment building, and control building in the event that the airborne radioactivity exceeds allowable levels. The containment building upper and lower compartment radiation monitors are designed to trend the containment airborne radioactivity for reactor coolant system leakage as described in Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems."

In accordance with GL 93-05, SQN has reviewed past calibration data for the subject radiation monitors. SQN's experience has been that the functional tests do not normally identify failures (i.e., pumps, flow switches). Similar monitors that currently have their functional testing performed quarterly also had their calibration and work request data reviewed. The quarterly testing data did not indicate different results from the monthly data. Also, performing the functional test on a monthly basis for these monitors results in unnecessary calibrations that consequently require the monitors to be out of service for significant periods of time. Therefore, this change will effectively increase system availability. In addition, channel checks will continue to be performed every shift on these monitors to be detected promptly. Thus, the SQN operating experience supports extending the functional test period from monthly to quarterly. This proposed change is compatible with SQN operating experience and is consistent with the guidance in NUREG-1366.

This conclusion is consistent with the recommendation provided in GL 93-05, which recommends to change the monthly functional tests to quarterly "to decrease licensee burden and increase the availability of radiation monitors."

Environmental Impact Evaluation

The proposed change does not involve an unreviewed environmental question because operation of SQN Units 1 and 2 in accordance with this change would not:

- 1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by NRC's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or decisions of the Atomic Safety and Licensing Board.
- 2. Result in a significant change in effluents or power levels.
- 3. Result in matters not previously reviewed in the licensing basis for SQN that may have a significant environmental impact.

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATION CHANGE SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2 DOCKET NOS. 50-327 AND 50-328 (TVA-SQN-TS-95-22)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION FOR THE RADIATION MONITORING INSTRUMENTATION SURVEILLANCE FREQUENCY REVISION

TVA has evaluated the proposed technical specification (TS) change and has determined that it does not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Operation of Sequoyah Nuclear Plant (SQN) in accordance with the proposed amendment will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

Review of the past history for the affected and similar radiation monitors revealed that extending the functional testing interval for these monitors will not adversely affect system operability and will effectively increase system availability. These radiation monitors are not accident initiating equipment, thus increasing the surveillance interval on these monitors will not affect the probability of any accident previously evaluated. Based on the above statements, it is concluded that the probability or consequences of an accident previously evaluated is not increased.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

No new type of accident or malfunction will be created since the radiation monitors are not accident initiating equipment. The proposed change merely increases the functional testing interval for the affected radiation monitors, and does not change the method and manner of plant operation. The safety design bases in the Updated Final Safety Analysis Report have not been altered. Therefore, this change does not create the possibility of a new or different kind of accident from any previously analyzed.

3. Involve a significant reduction in a margin of safety.

The proposed changes do not change the plant configuration in a way that introduces a new potential hazard to the plant and do not involve a significant reduction in the margin of safety. The proposed changes do not affect applicable safety analysis acceptance criteria and will not affect system operating conditions. Additionally, plant operating experience with similar monitors has shown that there has not been additional failures due to the quarterly testing frequency. Thus, it is concluded that the margin of safety is not reduced.