ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-92-06)

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6.2.3 INDEPENDENT SAFETY ENGINEERING (ISE)

FUNCTION

6.2.3.1 The ISE shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISE shall be composed of at least 3 dedicated full-time engineers located onsite. These engineers will be supplemented as necessary by full-time engineers shared among all TVA nuclear sites to achieve an equivalent staffing of 5 full-time engineers performing the ISE functions applicable to Sequoyah. R123

RESPONSIBILITIES

6.2.3.3 The ISE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the ~~Manager of Nuclear Managers Review Group.~~ MANAGER, NUCLEAR REVIEWS

6.2.4 SHIFT TECHNICAL ADVISOR (STA)

6.2.4.1 The STA shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit. R15 R16

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications ~~of ANSI N18.1-1971~~ for comparable positions ~~and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, except for the Site Radiological Control Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.~~ AS SPECIFIED IN THE TVA NUCLEAR QUALITY ASSURANCE PLAN. R78 R15

*Not responsible for sign-off function.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Plant Manager and shall meet or exceed the requirements ~~and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees,~~ and shall include familiarization with relevant industry operational experience. R15 R62

TVA NUCLEAR QUALITY ASSURANCE PLAN,

6.5 REVIEW AND AUDIT

6.5.0 The Senior Vice President, Nuclear Power is responsible for the safe operation of all TVA power plants. R78

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety. R62

COMPOSITION

6.5.1.2 The PORC shall be composed of the: R156

Chairman:	Plant Manager
Member:	Operations Manager
Member:	Site Radiological Control Manager
Member:	Maintenance Manager
Member:	Technical Support Manager
Member:	Quality ~~Engineering~~ and Monitoring ~~Supervisor~~ R156
Member:	Nuclear Engineering Representative

AUDIT

MANAGER

AUG

6.10.2 The following records shall be retained for the duration of the Unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

d. Records of gaseous and liquid radioactive material released to the environs.

e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the facility staff. R78

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required for lifetime retention by the Nuclear Quality Assurance ~~Manual~~ PLAN R62

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the PORC, SQN RARC, and the NSRB. R62

l. Records of analyses required by the radiological environmental monitoring program.

m. Records of secondary water sampling and water quality.

n. Records of the service life monitoring of all safety-related hydraulic and mechanical snubbers, required by T/S 3.7.9, including the maintenance performed to renew the service life.

o. Records for Environmental Qualification which are covered under the provisions of Paragraph 2.c.(12)(b) of License No. DPR-77. R62

p. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM. R

6.2.3 INDEPENDENT SAFETY ENGINEERING (ISE)

FUNCTION

6.2.3.1 The ISE shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISE shall be composed of at least 3 dedicated full-time engineers located onsite. These engineers will be supplemented as necessary by full-time engineers shared among all TVA nuclear sites to achieve an equivalent staffing of 5 full-time engineers performing the ISE functions applicable to Sequoyah. R108

RESPONSIBILITIES

6.2.3.3 The ISE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the ~~Manager of Nuclear Managers Review Group.~~ MANAGER, NUCLEAR REVIEWS

6.2.4 SHIFT TECHNICAL ADVISOR (STA)

6.2.4.1 The STA shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit. R142 R66

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications ~~of ANSI N18.1-1971~~ for comparable positions ~~and the supplemental requirements specified in Section A and C of Enclosure 1 of March 28, 1980 NRC letter to all licensees, except for the Site Radiological Control Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.~~ R142

AS SPECIFIED IN THE TVA NUCLEAR QUALITY ASSURANCE PLAN.

*Not responsible for sign-off function.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Plant Manager and shall meet or exceed the requirements ~~and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A"~~ of 10 CFR Part 55 and the ~~supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees,~~ and shall include familiarization with relevant industry operational experience. R142 R50

TVA NUCLEAR QUALITY ASSURANCE PLAN,

6.5 REVIEW AND AUDIT

6.5.0 Senior Vice President, Nuclear Power is responsible for the safe operation of all TVA power plants. R66

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety. R50

COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:	Plant Manager	R142
Member:	Operations Manager	
Member:	Site Radiological Control Manager	
Member:	Maintenance Manager	
Member:	Technical Support Manager	
Member:	Quality ~~Engineering~~ and Monitoring ~~Supervisor~~	R142
Member:	Nuclear Engineering Representative	

AUDIT

MANAGER

AUG 2

6.10.2 The following records shall be retained for the duration of the Unit Operating License: R28

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

d. Records of gaseous and liquid radioactive material released to the environs.

e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the facility staff.

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required for lifetime retention by the Nuclear Quality Assurance ~~Manual~~ PLAN R50

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the PORC, SQN RARC, and the NSRB R50

l. Records of analyses required by the radiological environmental monitoring program.

m. Records of secondary water sampling and water quality.

n. Records of the service life monitoring of all safety-related hydraulic and mechanical snubbers, required by T/S 3.7.9, including the maintenance performed to renew the service life.

o. Records for environmental qualification which are covered under the provisions of paragraph 2.C.(10)(b) of license No. DPR-79. R34

p. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM. R134

R134

ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-92-06)

DESCRIPTION AND JUSTIFICATION FOR

PROPOSED CHANGE TO SPECIFICATIONS 6.2.3.4,

6.3.1, 6.4.1, 6.5.1.2, AND 6.10.2i

Description of Change

Tennessee Valley Authority (TVA) proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 technical specifications (TS) to revise Specification 6.2.3.4 to reflect a restructuring within TVA's Nuclear Power organization. The proposed administrative change specifically addresses Independent Safety Engineering (ISE) with regard to the title of the manager to whom ISE reports.

The proposed change to Specifications 6.3.1 and 6.4.1 reflects that the staff qualification and training program requirements are specified in the Nuclear Quality Assurance Plan.

The proposed changes to Specifications 6.5.1.2 and 6.10.2i are minor administrative changes that reflect the current TVA organizational nomenclature for the Nuclear Quality Assurance Plan and update the title for the Quality Assurance (QA) Manager currently serving on the Plant Operations Review Committee (PORC).

Reason for Change

As part of an organizational change in September of 1991, TVA brought the corporate Nuclear Experience Review function into the Nuclear Managers Review Group (NMRG). At that time, TVA changed the name of the group from NMRG to Nuclear Reviews to more accurately reflect the expanded organizational responsibilities. That change did not impact ISE in that the same reporting relationships were maintained. The organizational changes within the management structure of TVA's Nuclear Power organization have been made to provide a sharper focus on oversight and assessment functions.

As part of an effort to make the TS consistent with the Nuclear Quality Assurance Plan and current regulatory guidance, TVA proposes to change Specifications 6.3.1 and 6.4.1, to reflect current staff qualifications and training requirements. TVA meets the requirements of Regulatory Guide (RG) 1.8, Revision 2, with alternatives as specified in the Nuclear Quality Assurance Plan.

The title of the QA Manager serving on PORC as specified in Specification 6.5.1.2 is being updated to reflect the current title for this position. The title change was a result of increased responsibilities recently added to this position.

Specification 6.10.2i is being revised to reflect the current title given to the document that summarizes the QA program at TVA.

Justification for Change

The proposed change to Specification 6.2.3.4 reflects the current TVA Nuclear Power organization. The organization maintains the appropriate level of independence with regard to ISE's review and auditing functions within TVA's Nuclear Power program. ISE will continue to perform on-site independent reviews of plant operations under the manager, Nuclear

Reviews, within the corporate Nuclear Assurance organization. This change maintains compliance with NUREG-0737 guidance and the standard TS to ensure that ISE reports to a high-level corporate official in a technically-oriented position who is not in the management chain for power production and not an integral part of the QA organization.

The proposed change to Specification 6.3.1 reflects TVA's commitment to meet the requirements of RG 1.8, Revision 2 (4/87) for all new personnel qualifying on positions identified in Regulatory Position C.1 after January 1, 1990. Personnel qualified on these positions before this date will still meet the requirements of RG 1.8, Revision 1-R (5/77). As specified in Regulatory Position C.2, all other positions will meet the requirements of American National Standards Institute/American Nuclear Society N18.1-1971. This commitment is currently reflected in the TVA Nuclear Quality Assurance Plan (TVA-NQA-PLN 89-A).

The proposed change to Specification 6.4.1 is to reflect that in 1987 10 CFR 55 was revised to allow facilities to substitute programs based on a systematic approach to training methodology and conducted using a plant-referenced simulator certified to NRC, for the existing regulatory based programs. This revision was promulgated to reflect the Commission's acceptance of industry initiatives in the training arena and is intended to provide flexibility to licensees who maintain accreditation through the National Academy for Nuclear Training and conduct training of operators on certified, plant-referenced simulators. This revision eliminated Appendix A of 10 CFR 55 and superseded the operator licensing requirements of NUREG 0737 and 0094. Clarification to the rule was provided in industry meetings throughout the United States and the questions and answers from these meetings were published in NUREG - 1262. In NUREG - 1262, Questions 1 through 4 clarify the issue of which requirements were superseded by this revision.

Training program structure and content guidance continue to be governed by the corporate-level training program procedures contained in the Nuclear Power Training Manual. These program procedures, which are quality related, are subject to review in accordance with 10 CFR 50.59. Additionally, these procedures describe the programs accredited by the National Academy for Nuclear Training. Accreditation is not granted or maintained unless compliance with the academy-published guidelines is established. These guidelines are consistent with, and in many areas, exceed the regulatory requirements previously required.

The proposed change to Specification 6.5.1.2 is to reflect the title change of a PORC member from, "Quality Engineering and Monitoring Supervisor" to "Quality Audit and Monitoring Manager." This is a title change only, and the duties and functions of this member remain the same.

In conclusion, the proposed change to Specification 6.2.3.4 still ensures that the independent assessment of plant activities by ISE meets or exceeds the requirements of NUREG-0737. Proposed changes to Specifications 6.3.1 and 6.4.1 are reflective of current regulatory guidance. Other proposed changes are for consistency with TVA's nomenclature and organizational structure as shown in the Nuclear Quality Assurance Plan that was received and approved by NRC letter dated March 3, 1992.

Environmental Impact Evaluation

The proposed change request 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 the staff'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 (TS) CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-92-06)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

ENCLOSURE 3

SIGNIFICANT HAZARDS EVALUATION

TVA has evaluated the proposed technical specification 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. The proposed title change of the corporate official to whom Independent Safety Engineering (ISE) makes recommendations has no effect on the safe operation of SQN. This change is administrative in nature and serves to reflect recent organizational changes within TVA's Nuclear Power program. The proposed change to Specifications 6.3.1 and 6.4.1 reflects consistency with the Nuclear Quality Assurance Plan and current regulatory guidance. The proposed changes to Specifications 6.5.1.2 and 6.10.2i are nomenclature and title changes only. Since the proposed amendment will not result in any changes to hardware, operating procedures, or accident analyses, the probability or consequences of an accident previously evaluated have not been increased.

(2) Create the possibility of a new or different kind of accident from any previously analyzed. The proposed change to Specification 6.2.3.4 provides a change in the title of the corporate official to whom ISE makes recommendations. This change is an administrative change that reflects realignment of the management structure within TVA's Nuclear Power organization. The proposed change to Specifications 6.3.1 and 6.4.1 reflects consistency with the Nuclear Quality Assurance Plan and current regulatory guidance. The proposed changes to Specifications 6.5.1.2 and 6.10.2i are nomenclature and title changes only. The proposed amendment does not involve a physical change to the facility; therefore, no new or different kind of accident is created.

(3) Involve a significant reduction in a margin of safety. The proposed revision to administrative Specification 6.2.3.4 reflects recent restructuring within TVA's Nuclear Power organization. This change in no way affects the physical facility design or safe operation of SQN. The function of ISE continues to conform with NUREG-0737 guidance for performing independent review of plant activities. The proposed change to Specifications 6.3.1 and 6.4.1 reflects consistency with the Nuclear Quality Assurance Plan and current regulatory guidance. The proposed changes to Specifications 6.5.1.2 and 6.10.2i are nomenclature and title changes only. Because compliance with the regulatory requirements has not been compromised and because these changes did not alter the facility or its design, there is no reduction in the margin of safety.