

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
1630 Chestnut Street Tower II

March 4, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

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

In enclosure 2 to the December 18, 1984 letter from me to you, TVA submitted a request for NRC approval of deviations to the requirements of Appendix R to 10 CFR 50. A request for NRC approval of additional deviations was submitted to you by my January 11, 1985 letter. Enclosed is a revision to deviation No. 15 provided by the January 11, 1985 letter.

If you have any questions concerning this matter, please get in touch with Jerry Wills at FTS 858-2683.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer
Nuclear Engineer

Sworn to and subscribed before me
this 4th day of March 1985

Paulette H. White

Notary Public
My Commission Expires 8-24-88

Enclosure

cc: U.S. Nuclear Regulatory Commission
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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ENCLOSURE
REVISED DEVIATION TO APPENDIX R REQUIREMENTS
SEQUOYAH NUCLEAR PLANT

15. Deviation - Section III.G of Appendix R states that one train of systems needed for hot standby must be free of fire damage. The NRC staff position on this rule states that operability of the hot standby systems must exist without repairs and that removal of fuses for isolation and use of jumpers are considered as repairs (reference SECY-83-269 letter dated July 5, 1983, attachment C, section b).

The main control room air handling unit (MRC AHU) remote control cable 1PL4512B interacts with cables associated with MCR AHU A-A on elevation 714 of the auxiliary building. The MCR AHU B-B cable 1PL4512B will be disabled in the event of a fire by lifting wires B21DT1, B21DTP, B21DG1, and B21DW in compartment 1D of the 480-V shutdown board 1B2-B, installing jumper between terminal blocks 26 and 27 on the compressor, and by replacing necessary control fuses. The HVAC system (Train-B) will then be operated using the local controls at the compressor. A casuality procedure will address the wire lifts, jumper, and control fuse replacement.

Justification - The wire lifts, jumper, and control fuse replacement discussed above will be necessary to achieve main control room (MCR) ventilation. Cable 1PL4512B is for remote control only. The wire lifts and jumper will only be required in the event the fire damage prevents the compressor from starting. Once the wire lift and jumper are accomplished, the compressor can be operated using existing manual controls located at the compressor.

SN operating experience indicates that MCR temperatures will not exceed 104° F within a five-hour time duration. The time required to complete the wire lifts, jumper, and control fuse replacement is approximately one hour. Adequate manpower is available to perform the required actions. The location where the postulated fire may cause loss of MCR AHU A-A and B-B (auxiliary building elevation 714) is separated from the MCR AHU B-B compressor and associated local controls, which is located in the control building, by 3-hour fire-rated construction. The 480-V shutdown board room 1B2-B where the wire lifts will be performed is separated from the postulated fire location by 1-1/2-hour fire-rated construction. In addition, automatic sprinklers, detection, standpipes, and portable extinguishers are provided for the above three locations.

TVA, therefore, requests approval for a deviation from the NRC staff position that operability of this hot standby system must exist without wire lifts, jumper, and control fuse replacements to achieve equipment operability.