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JAN 11 1988

U.S. Nuclear Regulatory Commission
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Gentlemen:

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

SEQUOYAH NUCLEAR PLANT - RESTART CRITERIA

The purpose of this letter is to clarify TVA's current position regarding use of the Restart Criteria (reference Nuclear Performance Plan [NPP], Volume 2, Table 7) at SQN. A letter from S. A. White to James G. Keppler dated September 28, 1987, "Sequoyah Nuclear Plant (SQN) System Heatup," addressed review of issues against technical specification (TS) operability requirements but requires clarification to fully apprise NRC of TVA's position for current and future use of operability requirements versus restart criteria. The initiatives and milestones associated with the planned nonnuclear heatup of unit 2 and restart of the units to power operation may confuse the issue. Accordingly, this letter will clearly define TVA's position regarding review criteria for both heatup and restart.

"Restart" represents unit criticality (mode 2); therefore, restart criteria are used to determine which issues must be resolved before criticality. Mode changes up to mode 2 (mode 5 to mode 4 to mode 3) are to be based upon TS operability requirements. Accordingly, for the purpose of the planned nonnuclear heatup of SQN unit 2, existing restart issues and new issues are being reviewed against TS operability requirements for determining those issues requiring resolution before mode changes. Review of issues against TS operability requirements does not affect any previous or future determination of issues requiring resolution before restart. The September 28, 1987 letter from S. A. White to James G. Keppler clearly addressed review of issues for heatup and completion of existing restart efforts; it did not clearly address how new issues are being and will be addressed for restart. The following provides clarification.

Restart criteria were implemented by TVA to provide a consistent prescribed basis for determining if a particular issue/problem should be resolved before restart of the nuclear units from the current outage. Use of the criteria would result in resolution before restart of some issues beyond direct TS operability issues. These criteria did not alter the basis for assessing operability, but only provided a broader interim review perspective consistent with other regulatory requirements, NRC expectations for restart of TVA's nuclear units, and TVA management objectives. It was always known that SQN would at some point transition back to review of issues against TS operability requirements for the purposes of assessing allowable plant operation. Review of issues against aspects prescribed in the restart criteria will essentially

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continue to occur by the Condition Adverse To Quality Report (CAQR) program implemented at SQN since February of this year. The CAQR process ensures resolution for nonoperability issues occurs in a timeframe commensurate with significance, NRC commitments and regulations, and TVA operating objectives and requirements.

The transition point was expected to occur when restart programs had been substantially completed and programs and processes were in place to address issues identified in the future. It was TVA's determination that this point had been reached for SQN in mid-September of this year, and the intent was therefore to review future issues solely against TS operability requirements for the purpose of determining all allowable plant operation. The majority of restart reviews had been completed, major programs had been implemented and inspected by NRC, the CAQR process was well established, fieldwork was nearing completion, and the site was readying for valve lineups in preparation of unit 2 entry into mode 4 for the nonnuclear heatup. However, with regard to actual implementation, TVA continued to use the restart criteria at SQN and continues to do so today. Implementing plant procedures requiring use of restart criteria were not and have not been changed. Further SQN management evaluation has determined that continued use of restart criteria is consistent with a conservative assessment of operability and commitments and implementation of TVA management objectives. In light of this reevaluation, TVA has decided to continue use of the restart criteria for SQN unit 2 until the time NRC concurrence is requested for restart of that unit. Use of restart criteria will continue for SQN unit 1; TVA will advise NRC of our plans for unit 1 before restart of unit 2.

In summary, TVA has and will continue to review issues against the restart criteria to determine those issues requiring resolution before restart. All mode changes before restart (mode 5 to mode 4 to mode 3) will be solely based upon TS operability requirements. Use of restart criteria for SQN unit 2 will continue until TVA requests NRC concurrence for restart of that unit. After this point, issues affecting unit 2 will be reviewed through the CAQR program and resolution scheduled consistent with TS operability requirements, internal/external agency requirements and regulations, TVA management objectives, and schedular considerations.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


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