



Tennessee Valley Authority, Post Office Box 2000, Dollywood, Tennessee 37379

October 8, 1998

TVA-SQN-TS-96-08, Revision 1 Supplement

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

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

**SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - TECHNICAL
SPECIFICATION (TS) CHANGE NO. 96-08, REVISION 1 -
CONFIGURATION RISK MANAGEMENT PROGRAM (CRMP)**

Reference: TVA letter to NRC dated August 27, 1998,
"Sequoyah Nuclear Plant (SQN) - Units 1 and 2 -
Technical Specification (TS) Change No. 96-08,
Revision 1, Section 3.8.1, 'A.C. Sources' and
Response to Request for Additional Information"

In accordance with the provisions of 10 CFR 50.4 and 50.90, TVA is submitting a supplemental change to the referenced request. The proposed change adds a CRMP to the Administrative Controls section and bases of TSs. The CRMP provides a probabilistic risk-informed assessment process to evaluate the overall impact of plant activities on plant risk with an emergency diesel generator (EDG) out-of-service. The proposed CRMP satisfies the Tier 3 recommendations in Regulatory Guide 1.177 for a risk-informed extension of the EDG allowed outage time (AOT). This change supersedes the discussions in the referenced TS change regarding TVA's intent to not include a CRMP based on the pending Maintenance Rule change. This supplemental change is an administrative

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change that does not affect the results of TVA's Tier 1 or Tier 2 analysis for the proposed 7-day EDG AOT.

On September 30, 1998, TVA met with NRC to present the key elements of the proposed CRMP for SQN. Agreements were made during this presentation for including additional procedural controls associated with potential external events within documents that implement SQN's CRMP. The following is a description of the additional controls:

- Ensure that the EDG limiting condition for operation action will not be voluntarily entered when severe weather is expected.
- Ensure that switchyard activities are controlled to minimize the potential impact to offsite power sources when an EDG is out-of-service.
- Ensure that safety systems in the same train of the same unit associated with an EDG are not scheduled for removal from service when the EDG is scheduled to be out-of-service. The redundant safety systems of the opposite train are required to be operable in accordance with SQN's TS requirements in Specification 3.0.5 when the associated EDG is inoperable.

During this meeting, NRC also requested additional information regarding the EDGs that were evaluated with respect to the core damage frequency (CDF) and large early release frequency (LERF) analysis. In particular, NRC wanted to know if the risk calculations considered the opposite unit's EDGs for these evaluations. Calculations have been performed considering the loss of the opposite unit's EDG. These calculations have determined that the increase in CDF is bounded by loss of an EDG on the primary unit. This is because of the numerous safety systems that are supported by the primary unit's 6.9 kV Shutdown Board, which is dependent on the primary unit's EDG. The calculations were performed during the development of the plant risk matrix for the 10 CFR 50.65 Maintenance Rule program and remains applicable for the proposed AOT extension. For the LERF calculations, the opposite unit EDGs were not specifically considered; however, similar to the CDF effort, the primary unit evaluations are considered to be more limiting and would bound the impact. This is also based on the minimal impact of the functions supported by the opposite unit EDGs that includes only one train of some common systems.

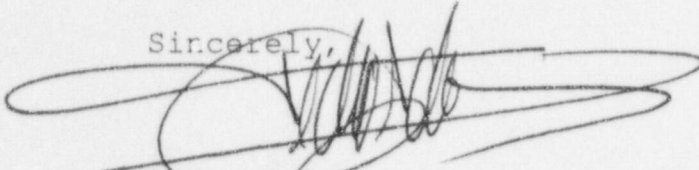
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TVA has determined that the significant hazards consideration associated with the proposed change in the referenced letter is still valid and that the change continues to be exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). These evaluations are not resubmitted in this supplemental request. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter to the Tennessee State Department of Public Health.

Enclosure 1 provides a description, reason, and safety analysis for the supplemental change. Enclosure 2 contains marked-up copies of the appropriate TS pages from Units 1 and 2 to show the supplemental changes. Enclosure 3 forwards the revised TS pages for Units 1 and 2 that incorporate the supplemental changes.

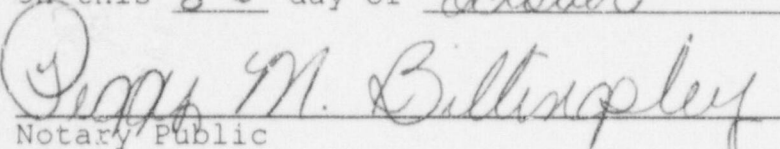
TVA requests that the supplemental TS changes be made effective within 45 days of NRC approval. If you have any questions about this change, please telephone me at (423) 843-7170 or J. D. Smith at (423) 843-6672.

Sincerely,



Pedro Salas
Licensing and Industry Affairs Manager

Subscribed and sworn to before me
on this 8th day of October



Peggy M. Billingsley
Notary Public

My Commission Expires

Oct. 21, 1998

Enclosures

cc: See page 4

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