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MAY 23 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 (SQN) - RESPONSE TO GENERIC LETTER (GL) 83-28, ITEM 4.5.3

Reference: NRC letter to licensees dated July 8, 1983, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)"

The purpose of this letter is to provide NRC with TVA's response to GL 83-28, item 4.5.3 (see reference letter), concerning existing intervals for online functional testing of the reactor trip system in order to achieve high system availability. TVA has reviewed the SQN technical specifications and has determined that the existing surveillance requirements and the associated plant surveillance and maintenance instructions are consistent with the Westinghouse Owners Group (WOG) quantitative evaluations of the reactor trip system, which considered test intervals. The two evaluations are reported in WCAP-10271, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System," and WCAP-11312, "Reactor Trip Breaker Maintenance/Surveillance Optimization Program."

These two evaluations included consideration of the five factors listed in the reference as appropriate for the type of evaluation performed. TVA concurs with the WOG evaluations and conclusions provided in these two reports. WOG concludes that the present test interval of two months is appropriate. This is consistent with SQN technical specification surveillance requirement 4.3.1.1.1. Furthermore, WOG recommends that breaker trips during surveillance testing should be minimized. The report also concludes that the performance of online preventive maintenance (PM) actions is not conducive to high reactor trip breaker (RTB) availability for a random safety challenge. Therefore, TVA will continue to schedule the performance of PM for the RTBs to refueling periods (a minimum of every 18 months).

TVA has recently revised maintenance instruction (MI) 10.9.1, "Reactor Trip Breaker Type DB-50 and Switchgear Inspection Associated with System 99," and MI-10.9.2, "Bypass Trip Breaker Type DB50 and Switchgear Inspection Associated with System 99," in order to bring them into compliance with the Westinghouse

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Electric Corporation (W) maintenance program manual (MPM) MPM-WOGRTSDB50-01 dated November 20, 1986, for W type DB-50 reactor trip circuit breakers and associated switchgear. These revisions to MI-10.9.1 and MI-10.9.2 agree with the required number of RTB cycles as provided in the W MPM and agree with WOG's recommendations to limit additional cycles that will accelerate RTB wear.

Based on the review of the related WOG studies and their findings, TVA agrees with WOG's conclusions. The existing intervals for online functional testing required by technical specifications are adequate to achieve high reactor trip system availability. Therefore, no technical specification revisions will be forthcoming concerning RTB online functional testing intervals. The information provided in this submittal completes TVA's response for the Safety Issues Management System item Nos. M54026 (unit 1) and M54027 (unit 2).

If further information is required, please telephone B. A. Kimsey at (615) 870-6847.

Very truly yours,

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