

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

March 5, 1986

Director of Nuclear Reactor Regulation
Attention: Mr. B. Youngblood, Project Director
PWR Project Directorate No. 4
Division of Pressurized Water Reactors (PWR)
Licensing A
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

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

By the October 23, 1979 letter from L. M. Mills to L. S. Rubenstein of NRC, we provided Revision 4 to NRC's Auxiliary Systems Branch (ASB), fire protection questions for the Sequoyah Nuclear Plant (SQN). Revision 4 included a response to NRC's position regarding emergency lighting. Enclosed is a revision to our previous commitment regarding emergency lighting and establishes a commitment to satisfy the requirements of Appendix R to 10 CFR 50, as well as the requirements of Appendix A to NRC's Branch Technical Position (BTP) 9.5-1 as they relate to emergency lighting.

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

Very truly yours,

TENNESSEE VALLEY AUTHORITY

R. Gridley
R. Gridley
Manager of Licensing

Sworn to and subscribed before me
this 5th day of March 1986

Paulette H. White
Notary Public

My Commission Expires 8-24-88

Enclosure

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Director of Nuclear Reactor Regulation

March 5, 1986

cc (Enclosure):

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

Mr. Carl Stahle
Sequoyah Project Manager
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, Maryland 20814

ENCLOSURE
REVISION OF COMMITMENT TO SAFETY REQUIREMENTS
FOR EMERGENCY LIGHTING
SEQUOYAH NUCLEAR PLANT
DOCKET NOS. 50-327, -328

By the October 23, 1979 letter to NRC, commitments were made regarding emergency lighting which we believe are now overly conservative when compared to current NRC requirements in Appendix R to 10 CFR 50. Our current commitment requires fixed self-contained lighting, consisting of fluorescent or sealed beam units with an individual eight-hour minimum battery power supply, be provided for all areas that must be manned for safe cold shutdown and for access and egress routes to all fire areas. 10 CFR 50, Appendix R, Section J, "Emergency Lighting" states, "Emergency lighting units with at least an 8-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto." Therefore, we are revising our commitment for emergency lighting to read as follows: "Emergency lighting units with at least an 8-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto as required by 10 CFR 50, Appendix R." Changing our commitment to the Appendix R requirements will provide significant long- and short-term cost savings while still meeting NRC requirements.

This position was discussed with a NRC Region II representatives during an October 1985 inspection at Sequoyah who indicated that this was an acceptable approach.