

ENCLOSURE 1  
PROPOSED TECHNICAL SPECIFICATION CHANGE  
SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2  
DOCKET NOS. 50-327 AND 50-328  
(TVA-SQN-TS-88-14)

LIST OF AFFECTED PAGES

Unit 1

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Unit 2

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TABLE 3.3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>
1. GROSS RADIOACTIVITY MONITORS PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a. Liquid Radwaste Effluent Line	1	30
b. Steam Generator Blowdown Effluent Line	1	31
c. Condensate Demineralizer Effluent Line	1	30
2. GROSS RADIOACTIVITY MONITORS NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a. Essential Raw Cooling Water Effluent Line <i>Header **</i>	1	32
b. Turbine Building Sump Effluent Line	1	32
3. FLOW RATE MEASUREMENT DEVICES		
a. Liquid Radwaste Effluent Line	1	33
b. Condensate Demineralizer Effluent Line	1	33
c. Steam Generator Blowdown Effluent Line	1	33
d. Cooling Tower Blowdown Effluent Line	1	33
4. TANK LEVEL INDICATING DEVICES		
a. Condensate Storage Tank	1	34
b. Steam Generator Layout Tank <sup>A</sup>	1	34

<sup>A</sup>Required when connected to the secondary system

\*\*Requires a minimum of one channel per header to be operable.

TABLE 3.3-12

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>
1. GROSS RADIOACTIVITY MONITORS PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a. Liquid Radwaste Effluent Line	1	30
b. Steam Generator Blowdown Effluent Line	1	31
c. Condensate Demineralizer Effluent Line	1	30
2. GROSS RADIOACTIVITY MONITORS NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a. Essential Raw Cooling Water Effluent <del>Line</del> Header **	1	32
b. Turbine Building Sump Effluent Line	1	32
3. FLOW RATE MEASUREMENT DEVICES		
a. Liquid Radwaste Effluent Line	1	33
b. Condensate Demineralizer Effluent Line	1	33
c. Steam Generator Blowdown Effluent Line	1	33
d. Cooling Tower Blowdown Effluent Line	1	33
4. TANK LEVEL INDICATING DEVICES		
a. Condensate Storage Tank	1	34
b. Steam Generator Layup Tank*	1	34

\*Required when connected to the secondary system

\*\*Requires a minimum of one channel per header to be operable.

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Amendment No. 3

ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-88-14)

DESCRIPTION AND JUSTIFICATION FOR  
CLARIFICATION TO TABLE 3.3-12

## ENCLOSURE 2

### Description of Change

Tennessee Valley Authority proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 Technical Specifications to revise Table 3.3-12, "Radioactive Liquid Effluent Monitoring Instrumentation." This change will clearly state the minimum radiation monitor channels required operable for each header for essential raw cooling water (ERCW) effluent.

### Reason for Change

TVA is requesting this change to avoid future misinterpretation of limiting condition for operation (LCO) 3.3.3.9, table 3.3-12, the minimum radiation monitor channels required operable for the ERCW effluent headers. On June 5, 1988, noncompliance of technical specifications resulted from an incorrect interpretation of the minimum radiation monitor channels required for the ERCW effluent line as stated in licensee event report 327/88-002. Table 3.3-12 lists the instrument as ERCW effluent line and gives the minimum radiation monitor channels required operable as one. Because there are "A" and "B" trains of ERCW, each with two radiation monitors for each discharge header, one monitor for each train must be operable.

### Justification for Change

The ERCW system is described in the Final Safety Analysis Report (FSAR), section 9.2.2. The system is designed to supply cooling water to various components within both the primary and secondary sections of each unit. Sufficient redundancy of piping and components is provided to ensure that cooling water is maintained to vital loads at all times. The ERCW effluent line consists of an A train and a B train discharge header on which radiation monitors O-RM-90-133 and O-RM-90-140 (A train) and O-RM-90-134 and O-RM-90-141 (B train) are located. 10 CFR 50, General Design Criterion (GDC) 64, requires that all effluent discharge paths be monitored for radioactive releases under normal operations. Also, Regulatory Guide (RG) 1.21 states that continuous monitoring should be provided for liquid effluent releases. Section 11.4.2.1.2 of the FSAR states that continuous monitoring is done with the above-mentioned devices to prevent the release of radioactive materials into the environment. SQN's design, with each header having separate sources of possible radioactive releases, is in compliance with GDC 64 and RG 1.21. These radiation detectors serve as accident monitors to detect leakage from either the component cooling or containment spray heat exchangers. The proposed change will clearly distinguish the A and B train headers and the minimum number of radiation monitor lines required to be operable.

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

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(TVA-SQN-TS-88-14)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

ENCLOSURE 3

Significant Hazards Evaluation

TVA has evaluated the proposed technical specification change and has determined that it does not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Operation of SQN in accordance with the proposed amendment will not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. This technical specification change involves only clarification to the original effluent release radiation monitoring configuration of the LCO in accordance with GDC 64 and RG 1.21 for SQN.
- (2) Create the possibility of a new or different kind of accident from any previously analyzed. There has not been any change in plant hardware or configuration to the ERCW radiation monitoring system that could result in an accident because of this technical specification.
- (3) Involve a significant reduction in a margin of safety. The present radiation monitoring limitations for the ERCW effluent remain the same. This technical specification change can only enhance SQN's margin of safety to the environment.