



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

June 24, 1999

TVA-SQN-TS-99-05

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. 99-05, "CLARIFICATION OF ICE CONDENSER ICE WEIGHING REQUIREMENTS"

In accordance with the provisions of 10 CFR 50.4 and 50.90, TVA is submitting a request for an amendment to SQN's Licenses DPR-77 and 79 to change the TSs for Units 1 and 2. The proposed change revises the Units 1 and 2 TSs to be consistent with the revision to the Improved Standard Technical Specifications (ISTS) presently submitted to the Nuclear Energy Institute Technical Specification Task Force (TSTF) for submittal as a revision to NUREG-1431. This proposed change was developed in coordination with the Westinghouse Owners Group - Ice Condenser Mini-Group (ICMG). The ICMG represents all five domestic Westinghouse Ice Condenser Plants: Catawba, D. C. Cook, McGuire, Sequoyah, and Watts Bar Nuclear Stations. SQN is considered to be the lead plant for the implementation of these revisions.

TVA has determined that there are no significant hazards considerations associated with the proposed change and that the change is exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). The SQN Plant

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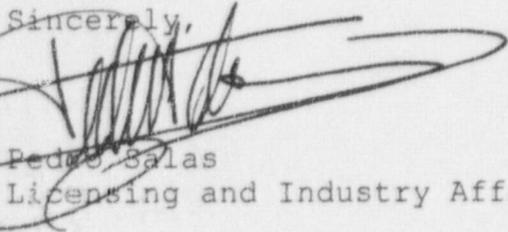
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Operations Review Committee and the SQN Nuclear Safety Review Board have reviewed this proposed change and determined that operation of SQN Units 1 and 2, in accordance with the proposed change, will not endanger the health and safety of the public. 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 to this letter provides the description and evaluation of the proposed change. This includes TVA's determination that the proposed change does not involve a significant hazards consideration, and is exempt from environmental review. Enclosure 2 contains copies of the appropriate TS pages from Units 1 and 2 marked up to show the proposed change. Enclosure 3 forwards the revised TS pages for Units 1 and 2 which incorporate the proposed change.

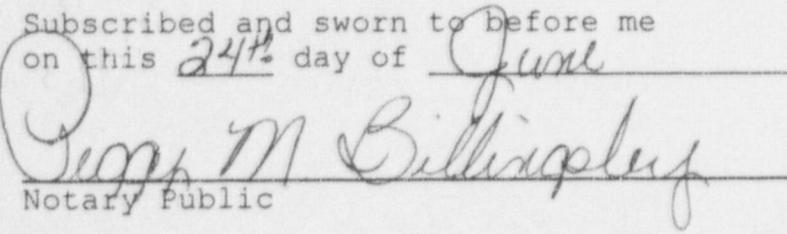
TVA requests that the revised TS be made effective within 45 days of NRC approval. If you have any questions about this change, please telephone me at (423) 843-7170 or J. D. Smith at (423) 843-6672.

Sincerely,



Pedro Salas
Licensing and Industry Affairs Manager

Subscribed and sworn to before me
on this 24th day of June



Greg M. Billingsley
Notary Public

My Commission Expires October 9, 2002

Enclosures
cc: See page 3

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cc (Enclosures):

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT (SQN)
UNITS 1 AND 2
DOCKET NOS. 327 AND 328

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE 99-05
DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

I. DESCRIPTION OF THE PROPOSED CHANGE

A change is requested to the current SQN Units 1 and 2 TSs to provide for consistency with the revision to the Improved Standard Technical Specifications (ISTS) submitted to the Nuclear Energy Institute Technical Specification Task Force (TSTF) for submittal as a revision to NUREG-1431. This proposed change was developed in coordination with the Westinghouse Owners Group - Ice Condenser Mini-Group (ICMG). The ICMG represents all five domestic Westinghouse Ice Condenser Plants: Catawba, D. C. Cook, McGuire, Sequoyah, and Watts Bar Nuclear Stations. SQN is considered to be the lead plant for the implementation of these revisions.

Specifically, the requested change reformats the discussion in Surveillance Requirement (SR) 4.6.5.1.d.2, addressing the actions required if the ice baskets selected for weighing in a single ice condenser bay falls below the minimum required value, into a note at the beginning of the SR. The note further clarifies that only 20 additional baskets should be weighed even if more than one ice condenser basket in a bay falls below the minimum required value. The proposed change also moves the ice basket selection methodology in SR 4.6.5.1.d.2 from the TS SR to the bases. The final requested revision to SR 4.6.5.1.d.2 adds a statement clarifying that the total ice weight described in the limiting condition of operation (LCO) is applicable to the beginning of each operating cycle. Revisions to the associated bases of this SR are also proposed to more accurately reflect the Improved Standard Technical Specification Bases as proposed in TSTF submittal.

II. REASON FOR THE PROPOSED CHANGE

The purpose of making the proposed change is to provide for consistency between the SQN TS related to weighing ice baskets in the ice condenser and the proposed revision to the ISTSs. These changes implement the methodology agreed upon by the Ice Condenser Mini Group in accordance with the

industry initiative related to ice condenser plants. The reformatting of the note to the TS SRs to address the actions required if one or more ice baskets selected for weighing in a single ice condenser bay falls below the minimum required value ensures a consistent interpretation of the requirements of the TSs. The proposed change to move the ice basket selection methodology from the TS SR to the bases is consistent with the ISTS format that provides for required values to be addressed in the SR and descriptions or methodologies to be a part of the bases. Providing a clarification in the TS SR and the associated bases that the ice condenser ice weight criteria is for the beginning of an operating cycle ensures consistent interpretation of the required weight since the overall ice weight in the ice condenser may fall below the specified value over an operating cycle due to sublimation.

III. SAFETY ANALYSIS

The proposed change provides for consistency between the SQN TS related to weighing ice baskets in the ice condenser and the proposed revision to the ISTSs described in the submittal from the TSTF. Reformatting the note to the TS SRs that addresses the actions required if one or more ice baskets selected for weighing in a single ice condenser bay falls below the minimum required value ensures a consistent interpretation of the requirements of the TSs and does not impact the intent or implementation of the TSs. The proposed change to move the ice basket selection methodology from the TS SR to the bases is consistent with the ISTS format that provides for required values to be addressed in the SR and descriptions or methodologies to be a part of the bases. This revision does not affect the implementation of the TS at SQN since the procedural requirement will not be affected. Providing a clarification in the TS SR and the associated bases that the ice condenser ice weight criteria is for the beginning of an operating cycle ensures consistent interpretation of the required weight since the overall ice weight in the ice condenser may fall below the specified value over an operating cycle due to sublimation. This proposed revision does not affect the intent or implementation of the TSs at SQN. The revisions proposed above will not result in any change in the design, maintenance, or operation of the ice condenser and its associated support equipment. Nor does this revision result in deviation from the actions presently approved by the staff for response to the associated LCO; therefore, it can be safely implemented at SQN.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TVA has concluded that operation of SQN Units 1 and 2, in accordance with the proposed change to the technical specifications (TSs), does not involve a significant hazards consideration. TVA's conclusion is based on its evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

A. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS amendments discussed below cannot increase the probability of occurrence of any analyzed accident because they are not the result or cause of any physical modification to the ice condenser structures, and for the current design of the ice condenser, there is no correlation between any credible failure and the initiation of any previously analyzed accident.

Regarding the consequences of analyzed accidents, the proposed amendment provides for consistency with the ISTSS by: (1) requiring the actions if one or more ice condenser ice baskets are determined to weigh below the minimum specified value to be made a part of the TS surveillance requirement (SR) instead of being located in the bases, and (2) relocating the ice basket selection methodology into the bases. This ensures consistent interpretation of the requirements of the TS in accordance with the ISTSS. The clarification of the response required if one or more ice baskets in a given bay are determined to be underweight ensures sufficient ice is maintained in each bay to prevent early meltout in a local zone following a design basis accident (DBA) and that the required overall ice weight is maintained in the ice condenser. The relocation of the ice basket selection methodology to the bases does not result in any change to the intent or implementation of this portion of the TSs since plant procedures ensure the requirements of the bases of the TSs are correctly implemented. Additionally, the clarification that the weight requirement is applicable to the beginning of the cycle does not change the present intent of the TS, but ensures there is no confusion, since the weight at the end of the operating cycle may be less than that specified in the SR due to sublimation. This does not result in a change to the intent or implementation of the TS since a sublimation allowance was provided in the original SR weight requirement. These clarifications do not result in any affect on plant

equipment or operation and the actions taken during the implementation of the revised TS will be the same as prior to the revision. Therefore, the clarification of these requirements will not increase the consequences of any accident previously evaluated.

B. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The inclusion of the action required for an underweight ice basket in the TS SR, instead of in the bases of the TS, provides for the consistent interpretation of the requirement. The clarification of the response required if one or more ice baskets in a given bay are determined to be underweight ensures sufficient ice is maintained in each bay to prevent early meltout in a local zone following a DBA and that the required overall ice weight is maintained in the ice condenser. The relocation of the ice basket selection methodology to the bases does not result in any change to the intent or implementation of this portion of the TSs since plant procedures ensure the requirements of the bases of the TSs are correctly implemented. Additionally, the clarification that the weight requirement is applicable to the beginning of the cycle does not change the present intent of the TS, but ensures there is no confusion, since the weight at the end of the operating cycle may be less than that specified in the SR due to sublimation. This does not result in a change to the intent or implementation of the TS since a sublimation allowance was provided in the original SR weight requirement. The operation, design and maintenance of the ice condenser and its associated equipment will not change as a result of these clarifications. Therefore, the implementation of these clarifications will not create the possibility of accidents or equipment malfunctions of a new or different kind from any previously evaluated.

C. The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed amendment allows for the consistent interpretation of the required actions if an ice basket is determined to weigh less than the required minimum. The inclusion of these actions in the TS SR instead of in the TS bases assures the correct actions will be taken as intended by the TSs. The clarification of the response required if one or more ice baskets in a given bay are determined to be

underweight ensures sufficient ice is maintained in each bay to prevent early meltout in a local zone following a DBA and that the required overall ice weight is maintained in the ice condenser. The relocation of the ice basket selection methodology to the bases does not result in any change to the intent or implementation of this portion of the TSs since plant procedures ensure the requirements of the bases of the TSs are correctly implemented. Additionally, the clarification that the weight requirement is applicable to the beginning of the cycle does not change the present intent of the TS, but ensures there is no confusion, since the weight at the end of the operating cycle may be less than that specified in the SR due to sublimation. This does not result in a change to the intent or implementation of the TS since a sublimation allowance was provided in the original SR weight requirement. The proposed clarifications do not result in or have any affect on the operation, design, or maintenance of any plant equipment. Thus the design limits for the continued safe function of the containment structure following a DBA are not exceeded due to this change; therefore, the proposed amendment does not involve a reduction in a margin of safety.

V. ENVIRONMENTAL IMPACT CONSIDERATION

The proposed change does not involve a significant hazards consideration, a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or a significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.