http://nrr10/projects/tia/85952.txt

September 14, 1993

Docket Nos. 50-327
and 50-328

MEMORANDUM FOR: Ellis W. Merschoff, Director
Division of Reactor Projects
Region II

FROM: Gus C. Lainas, Assistant Director
for Region II Reactors
Division of reactor Projects - I/II

SUBJECT: RESPONSE TO TIA 93-002: SEQUOYAH ICE BASKET WEIGHTS (TAC NOS. M85952 and M85953)

By memorandum dated February 17, 1993, from Ellis W. Merschoff to Gus C. Lainas, Region II requested NRR assistance in reviewing technical evaluations performed by the Tennessee Valley Authority related to a licensee event report indicating that Sequoyah Units 1 and 2 operated with less than the minimum required amount of ice in certain containment ice condenser ice basket row-groups. In addition to requesting assistance in reviewing the evaluations, the TIA requested an NRR position regarding whether the ice weighing program required by Technical Specification (TS) 4.6.5.1.d requires a determination and evaluation of as-found ice basket weights.

NRR has completed its review and a detailed summary of this review is enclosed. Based on our findings, we conclude that the licensee has performed an acceptable analysis of the event.

Regarding Sequoyah Technical Specification 4.6.5.1.d, and whether it requires an as-found surveillance test and evaluation, it is our conclusion that the TS does not specifically include such a requirement, but that 10 CFR 50.73(a)(2)(v) does. With the exception of certain Appendix J tests, licensee's may, during an outage, perform planned maintenance prior to surveillance testing. Also, once surveillance testing is begun, if the need for additional maintenance is indicated, the tests may be discontinued and started over again later. Such actions are not prohibited by the TS and are routine. However, 10 CFR 50.73(a)(2)(v) requires a 30-day report (LER) upon discovery of any condition that could have prevented the fulfillment of a safety function. It is our position that once it becomes obvious to personnel performing a surveillance test that the test has failed or will fail, the reporting requirement invokes the need for an operability evaluation.

9/14/93

http://nrr10/projects/tia/85952.txt

This action closes TAC Nos. M85952 and M85953. They may be reopened if further evaluation on this subject is requested by Region II.

Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects - I/II

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 6, 1993

Docket No. 50-397

MEMORANDUM FOR: Kenneth E. Perkins, Director
Division of Reactor Safety and Projects
Region V

FROM: Elinor G. Adensam, Assistant Director
for Region IV & V Reactors
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

SUBJECT: INTERPRETATION OF OPERATIONS WITH THE POTENTIAL FOR DRAINING THE REACTOR VESSEL AT WNP-2 (TAC NO. M66762)

We are providing the NRR response to your memorandum to Jack Roe dated June 11, 1993. Your memorandum, which followed extensive discussions with NRR staff and an E-mail request from Phillip M. Johnson dated June 3, 1993, requested NRR's interpretation of a footnote in the WNP-2 technical specifications (TS) that dealt with having secondary containment established "[W]hen irradiated fuel is being handled in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel." We have addressed this action as a Task Interface Agreement (TIA).

In the TS, the word "potential" means "something that exists in a state of potency or possibility for changing or developing into a state of actuality." It follows from this definition that even though features are provided that reduce the likelihood of draining the reactor vessel, the potential for such draining can continue to exist. The operation described in your memorandum was the use of the residual heat removal (RHR) system to lower the water level in the reactor cavity. Two independent suction valves were designed to automatically isolate at a specified water level. However, since the failure of both is possible, this is an "operation with a potential for draining the reactor vessel."

If the licensee believes that any conditions described by "operations with a potential for draining the reactor vessel" should not require the

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establishment of secondary containment, a request for change to the TS along with justification (e.g. compensatory action) should be made to the staff. A good avenue to propose the change is through the Owners Groups in the implementation of improved Standard Technical Specifications.

The NRR staff recognizes the generic applicability of this issue. We are working with the BWROG to ensure a consistent definition for this TS.

Elinor G. Adensam

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establishment of secondary containment, a request for change to the IS along with justification (e.g. compensatory action) should be made to the staff. A good avenue to propose the change is through the Owners Groups in the implementation of improved Standard Technical Specifications.

The NRR staff recognizes the generic applicability of this issue. We are working with the BWROG to ensure a consistent definition for this IS

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