

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

5N 157B Lookout Place

AUG 07 1989

TVA-SQN-TS-89-37

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) - TECHNICAL SPECIFICATION (TS) CHANGE 89-37

In accordance with 10 CFR 50.90, we are enclosing a requested amendment to licenses DPR-77 and DPR-79 to change the TSs of SQN Units 1 and 2. The proposed change adds an action statement to address the failure to meet the surveillance requirements for cold leg accumulator level and pressure instrumentation.

The proposed TS change is identified in Enclosure 1. The justification for the proposed TS change is provided in Enclosure 2. A proposed determination of no significant hazards consideration performed pursuant to 10 CFR 50.92 is provided in Enclosure 3.

The possibility of multiple interpretations for the actions to be taken when either or both of the redundant cold leg accumulator level or pressure instruments are out of service has been identified as a problem with TS 3.5.1.1. The action statements presently contained in TS 3.5.1.1 do not address out-of-service instruments. Consequently, the operator is required to interpret TSs 3.0.3 and 4.0.3 to determine if and what out-of-service times apply. As part of our commitment in the June 1989 enforcement conference, TVA agreed to promptly and expeditiously address such problems.

TVA has made a good faith effort with respect to the development and implementation of the TSs, as evidenced by the current conformance to the NRC's standard TSs. TVA has also made a good faith effort to promptly address potential interpretation problems raised by interested parties. Therefore, TVA requests that this proposed change be given emergency processing priority. TVA also requests a waiver of compliance for the period of time required to process this change to preclude the potential for unit derating or enforcement action caused by interpretation problems with the timeframes available to correct equipment problems. It should be noted that the cold leg accumulators have been verified capable of performing their intended safety function through performance of surveillance requirement (SR) 4.5.1.1.1 at least once every 12 hours.

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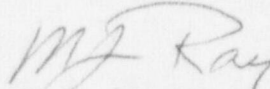
U.S. Nuclear Regulatory Commission

As a result of inconsistencies noted with the treatment of compliance instruments in the SQN TSs and the differences in treatment of the cold leg accumulator instruments by the industry (e.g., Callaway, McGuire, and Catawba Nuclear Plants and Westinghouse Owners Group Merits), TVA intends to submit a long-term solution to this problem as a separate licensing action.

Please direct questions concerning this issue to B. S. Schofield at (615) 843-6172.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



M. J. Ray, Manager
Licensing Project Management

Sworn to and subscribed before me
this 7th day of August 1989

Paulette A. White
Notary Public
My Commission Expires 11-4-92

Enclosures
cc: See page 3

U.S. Nuclear Regulatory Commission

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