



1101 Market Street, Chattanooga, Tennessee 37402

CNL-24-061

August 19, 2024

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Sequoyah Nuclear Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Units 1 and 2
Facility Operating Licenses Nos. NPF-90 and NPF-96
NRC Docket Nos. 50-390 and 50-391

Subject: Supplement to “Application to Revise Function 5 of Technical Specification Table 3.3.2-1, ‘Engineered Safety Feature Actuation System Instrumentation,’ for the Sequoyah Nuclear Plant and Watts Bar Nuclear Plant (SQN-TS-23-02 and WBN-TS-23-08),” (EPID L-2023-LLA-0175)

Reference: TVA letter to NRC, CNL-23-036, “Application to Revise Function 5 of Technical Specification Table 3.3.2 1, ‘Engineered Safety Feature Actuation System Instrumentation, for the Sequoyah Nuclear Plant and Watts Bar Nuclear Plant (SQN TS 23-02 and WBN-TS-23-08),” dated December 18, 2023 (ML23352A298)

In the referenced letter, Tennessee Valley Authority (TVA) submitted a request for an amendment to Renewed Facility Operating License Nos. DPR-77 and DPR-79 for the Sequoyah Nuclear Plant (SQN), Units 1 and 2, and Facility Operating License Nos. NPF-90 and NPF-96 for the Watts Bar Nuclear Plant (WBN), Units 1 and 2, respectively. The proposed change would add the following note to SQN Units 1 and 2 and WBN Units 1 and 2 Technical Specification (TS) 3.3.2, “Engineered Safety Feature Actuation System (ESFAS) Instrumentation,” Table 3.3.2-1, Functions 5a and 5b, “Turbine Trip and Feedwater Isolation.”

“Turbine trip function is not required when all turbine stop valves or all governor valves are closed and are incapable of opening.”

The enclosure to this letter contains a revised response to Question 1 of Section 4.3, “No Significant Hazards Consideration Determination Analysis,” of the referenced letter.

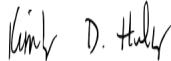
The enclosure to this letter supersedes the corresponding response to Question 1 of Section 4.3 in the referenced letter. Additionally, Section 1.0, "Summary Description," of the referenced letter incorrectly referred to Note (j) of SQN Unit 2 TS Table 3.3.2-1, Functions 5a and 5b. The correct reference is Note (i).

This letter does not change the remaining no significant hazard consideration or the environmental consideration contained in the referenced letter. Additionally, in accordance with Title 10 of the *Code of Federal Regulations* 50.91(b)(1), TVA is sending a copy of this letter and enclosures to the Tennessee State Department of Environment and Conservation.

There are no new regulatory commitments associated with this submittal. Please address any questions regarding this request to Stuart L. Rymer, Senior Manager, Fleet Licensing, at slymer@tva.gov.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 19th day of August 2024.

Respectfully,



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Date: 2024.08.19 09:29:25
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Kimberly D. Hulvey
Director, Nuclear Regulatory Affairs

Enclosure: Revised Response to Question 1 of Section 4.3, "No Significant Hazards Consideration Determination Analysis"

cc (Enclosure):

NRC Regional Administrator – Region II
NRC Senior Resident Inspector - Sequoyah Nuclear Plant
NRC Senior Resident Inspector – Watts Bar Nuclear Plant
NRC Project Manager - Sequoyah Nuclear Plant
NRC Project Manager – Watts Bar Nuclear Plant
Director, Division of Radiological Health – Tennessee State Department of Environment and Conservation

Enclosure

Revised Response to Question 1 of Section 4.3, "No Significant Hazards Consideration Determination Analysis"

1. *Does the proposed amendment involve a significant increase in the probability or consequence of an accident previously evaluated?*

Response: No

The proposed change will not alter any plant components, systems, or processes and will provide a more appropriate value to assess operability of the associated pressure switches. Because the plant features and operating practices are not altered, the probability of an accident is not affected. ~~This trip function is not directly credited in the SQN and WBN accident analysis.~~ There is not a specific safety limit associated with the Turbine Trip and Feedwater Isolation function; therefore, the proposed change will not impact any previously evaluated design basis accidents. The proposed change will continue to provide an acceptable anticipatory trip signal, and the offsite dose potential is not affected by this change.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.