



1101 Market Street, Chattanooga, Tennessee 37402

CNL-24-084

January 13, 2025

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

**Subject: Response to Request for Confirmatory Information Regarding Application to Revise the Fuel Handling Accident Analysis, to Delete Technical Specification 3.9.4, "Containment Penetrations," and to Modify Technical Specification 3.3.6, "Containment Ventilation Isolation Instrumentation" for Sequoyah Nuclear Plant (SQN-TS-24-01) (EPID L-2024-LLA-0117)**

- References:
1. TVA letter to NRC, CNL-24-041, "Application to Revise the Fuel Handling Accident Analysis, to Delete Technical Specification 3.9.4, "Containment Penetrations," and to Modify Technical Specification 3.3.6, "Containment Ventilation Isolation Instrumentation" for Sequoyah Nuclear Plant (SQN-TS-24-01)," dated August 28, 2024 (ML24247A185)
  2. NRC electronic mail to TVA, "Request for Confirmatory Information – LAR to modify the FHA Analysis, delete TS 3.9.4 and to modify TS 3.3.6 - L-2024-LLA-0117," dated December 12, 2024 (ML24347A029)

In Reference 1, 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, Units 1 and 2, respectively. The proposed change would allow material to be transferred through containment penetrations in parallel with movement of irradiated fuel assemblies, thus facilitating a more efficient refueling outage schedule with no adverse effect on public health and safety.

In Reference 2, the Nuclear Regulatory Commission issued a request for confirmatory information (RCI) and requested that TVA respond by January 13, 2025.

The Enclosure to this submittal provides the response to the RCI.

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

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There are no new regulatory commitments in this letter. Please address any questions regarding this submittal to Amber V. Aboulfaida, Senior Manager, Fleet Licensing, at [avaboulfaida@tva.gov](mailto:avaboulfaida@tva.gov).

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of January 2025.

Respectfully,

 Digitally signed by Edmondson,  
Carla  
Date: 2025.01.13 17:02:00 -05'00'

Kimberly D. Hulvey  
General Manager, Nuclear Regulatory Affairs & Emergency Preparedness

Enclosure: Response to NRC Request for Confirmatory Information

cc (Enclosure):

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

Enclosure

Response to NRC Request for Confirmatory Information

## Enclosure

### NRC Background

*By letter dated August 28, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24247A185), the Tennessee Valley Authority (TVA) submitted a license amendment request to the U.S. Nuclear Regulatory Commission. The request is to revise the Fuel Handling Accident Analysis, to delete Technical Specification 3.9.4, and to modify Technical Specification 3.3.6 for Sequoyah Nuclear Plant, Unit 1 and 2.*

### Question 1

*RG 1.183, Revision 0, Footnote 11 states that the non-LOCA gap release fractions in Table 3 of RG 1.183 Rev. 0 are acceptable for fuel with a peak rod-average burnup up to 62 GWd/MTU, provided the maximum linear heat generation rate does not exceed 6.3 kW/ft peak rod average power for burnups exceeding 54 GWd/MTU.*

*Table 3.1.1-1 of Enclosure 1 of the license amendment request indicates that the RG 1.183 Rev. 0 non-LOCA gap release fractions are used in the updated fuel handling accident dose analysis, but does not clarify that the Footnote 11 range of applicability is met. Please confirm that the RG 1.183 Rev. 0 Footnote 11 burnup and linear heat generation rate range of applicability will be met.*

### TVA Response

TVA confirms that the Regulatory Guide 1.183, Rev. 0 Footnote 11 burnup and linear heat generation rate range of applicability will be met.