



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

December 17, 1999

10 CFR 50.90
10 CFR 50.12
10CFR50.54(ee)

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) - IN ACCORDANCE WITH 10 CFR 50.90 and 50.12, REQUEST FOR LICENSE AMENDMENT AND EXEMPTION FROM 10 CFR 50.54(ee), "CONDITION OF LICENSE," TO ALLOW RECEIPT AND STORAGE OF LOW-LEVEL RADIOACTIVE WASTE (LLRW) FROM UNIT 1 OF THE WATTS BAR NUCLEAR PLANT (WBN)

Pursuant to the provisions of 10 CFR 50.90 and 50.12(a), TVA requests a license amendment and an exemption from the requirements of 10 CFR 50.54(ee) regarding authorization to possess and receive back at a nuclear plant site only the byproduct and special nuclear material produced at that site. Should TVA's request be granted, SQN would be permitted to receive and store LLRW generated at WBN Unit 1. TVA and NRC met to discuss these issues on November 23, 1999, at NRC offices in Rockville, Maryland.

Enclosure 1 to this letter contains the rationale for seeking this exemption. The discussion includes an explanation of the requested exemption, followed by the background and regulatory history of the previously licensed SQN on-site storage facility for radioactive waste, and a detailed justification relative to the exemption requirements of 10 CFR 50.12 (a)(2).

Enclosure 2 contains the proposed license amendment package that would modify License Provision Statement 2.B.(5) in Licenses DPR-77 and -79 for SQN Units 1 and 2, respectively, to remove a potential restriction on receiving low-level radioactive waste generated at WBN Unit 1. Enclosure 3 contains copies of the appropriate pages from the SQN Units 1

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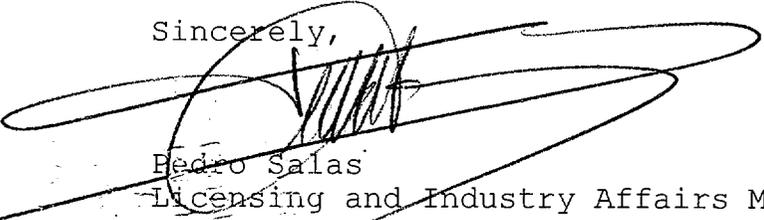
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and 2 licenses that have been marked to show the proposed changes. Enclosure 4 forwards the revised pages for SQN Units 1 and 2 licenses that incorporate the proposed changes. The amendment request is submitted in accordance with the provisions of 10 CFR 50.4 and 50.90, for changes to the licenses. Pursuant to 10 CFR 50.91(a)(1) and 10 CFR 50.92(c), TVA has determined that there are no significant hazards considerations associated with the proposed change. Pursuant to 10 CFR 51.22(c)(9), TVA has determined that the proposed change does not individually or cumulatively have a significant effect on the human environment, and thus should be categorically excluded from further environmental review.

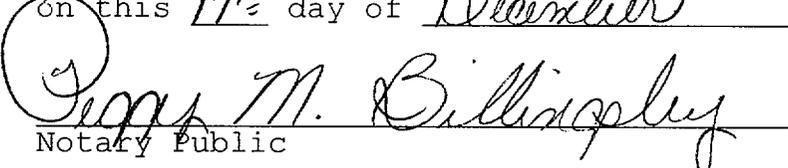
The SQN Plant Operations Review Committee and the SQN Nuclear Safety Review Board have reviewed this proposed change and determined that operation of SQN in accordance with the proposed change will not endanger the health and safety of the public. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter to the Tennessee State Department of Public Health.

TVA requests that the amended licenses be made effective within 45 days of NRC approval. NRC approval is requested by May 1, 2000. Please direct questions or comments concerning this issue to me at (423) 843-7170 or C. L. Wilson at (423) 751-6153.

Sincerely,



Pedro Salas
Licensing and Industry Affairs Manager

Subscribed and sworn to before me
on this 17th day of December

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

IN ACCORDANCE WITH 10 CFR 50.12, REQUEST FOR EXEMPTION FROM
10 CFR 50.54(ee), "CONDITION OF LICENSE"

EXEMPTION REQUESTED

TVA hereby requests, for both SQN units, an exemption from the Condition of License requirement stated in 10 CFR 50.54(ee), which requires that only by-product and special nuclear material produced at a nuclear plant site may be received back at that site. By-product material and small amounts of special nuclear material are present as the radioactive contaminants in certain low-level radioactive wastes (LLRW) (such as ion-exchange resins, pressurized water reactor filters, tank solids, irradiated metal reactor components, and dry active waste) which have previously been shipped to the Chem-Nuclear facility near Barnwell, South Carolina for permanent deep-trench disposal.

Upon NRC approval of this license amendment and exemption from 10 CFR 50.54(ee), TVA plans to transport LLRW from Unit 1 of the Watts Bar Nuclear Plant (WBN) to SQN for storage in a facility designed for that purpose.

BACKGROUND AND REGULATORY HISTORY

In response to increasingly expensive access and disposal fees and the possible sudden closure of the Barnwell repository, TVA has evaluated its onsite storage capabilities, including the refurbishment of existing on-site LLRW storage facility modules. Modules were constructed at SQN in the early 1980s but were never utilized. TVA had envisioned the possibility of off-site disposal restrictions at that time and had designed the LLRW storage facility to have sufficient capacity to permit power operations to continue for the design life of the plant.

The NRC granted Materials License No. 41-08165-14 (and issued the accompanying Safety Evaluation Report and Environmental Impact Appraisal) on September 17, 1982, for use of the LLRW storage facility at SQN for a period of five years. However, consistent with the NRC policy of utilizing permanent off-site disposal whenever possible, LLRW

shipments were continued to Barnwell. Consequently, no radwaste was stored in the SQN facility. The materials license was renewed once prior to expiration, but on April 25, 1990, TVA requested its termination since there were no plans for use in the foreseeable future. The termination request noted that if use of the facility became necessary, TVA would not need to renew the materials license but would instead perform a 10 CFR 50.59 evaluation as allowed in Generic Letter 81-38, "Storage of Low-Level Radioactive Wastes at Power Reactor Sites."

JUSTIFICATION

10 CFR 50.12 authorizes the Commission to grant exemptions from the requirements of the regulations when special circumstances are present. TVA believes that such special circumstances are present in this instance to warrant exemption from the regulatory requirements of 50.54(ee). Under Sections (ii) through (v) of 10 CFR 50.12(a)(2), special circumstances are present whenever:

(ii) Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.

TVA understands the purpose of 10 CFR 50.54(ee) to be the prevention of any given nuclear power plant site from collecting radioactive waste from other nuclear plant sites that could be sent to Barnwell or a similar facility, such that permanent disposal is delayed or avoided. TVA has, until now, made regular shipments to Barnwell; however, recent escalating LLRW access and disposal fees at Barnwell, and the prospect of sudden closure of the facility with no other alternative facility becoming available in the foreseeable future, have forced TVA to develop alternatives until such time as a practical off-site repository option again becomes available.

Literal application of 10 CFR 50.54(ee) would have the effect of forcing TVA to construct a new facility for storage of LLRW at WBN. Once a facility has been constructed at WBN that meets all pertinent requirements for long-term, and perhaps permanent storage, there would be a significant financial disincentive to incur further costs of shipment to an off-site permanent repository.

(iii) Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated;

When this regulation was adopted, it was widely contemplated that a number of permanent repositories, in addition to Barnwell, would be developed and become available for receipt and disposal of LLRW in a cost-effective manner. This has not been the case. Access and disposal fees at Barnwell are rising to the point where other cost effective disposal options must be developed. The prospect of sudden closure of Barnwell, and the lack of any currently suitable off-site permanent disposal site, dictate that suitable on-site alternatives must be developed. Allowing the LLRW generated at WBN Unit 1 to be stored at SQN in the existing LLRW storage modules would allow TVA to continue to store its LLRW in a safe, cost-effective manner.

(iv) The exemption would result in benefit to the public health and safety that compensates for any decrease in safety that may result from the grant of the exemption;

There is no decrease in safety which would result from the grant of the exemption. The 35-mile transportation route from WBN to SQN does not present any significant potential negative impacts on the public health and safety. In the event that the LLRW is ultimately transported to an off-site permanent repository, this small distance would very likely constitute a small increment of the distance to the off-site repository. For example, this distance (35 miles) is short compared with the distance from WBN to Barnwell (370 miles). The shipment of LLRW from WBN was reviewed as part of the WBN Unit 1 operating license request (WBN Final Safety Analysis Report [FSAR] Section 11.5.6). Storage at SQN also has the added benefit of allowing radioactive decay prior to any eventual shipment to an off-site repository, with an associated reduction in transport risks.

(v) The exemption would only provide temporary relief from the applicable regulation and the licensee or applicant has made good faith efforts to comply with the regulation.

Transporting WBN LLRW to SQN would provide temporary relief until such time as a practical alternative off-site repository becomes available, or the Barnwell facility again becomes an assured and cost-effective permanent disposal site.

As stated by the NRC in its Environmental Impact Appraisal for Materials License No. 41-08165-14 issued for the SQN LLRW on-site storage facility on September 17, 1982 (Docket No. 30-19101), the quality of the human environment will not be significantly affected and there will be no significant environmental impact from the operation of the SQN LLRW OSF. The added LLRW stored as a result of WBN's single unit operations will remain within the original design and proposed capacity limitations considered in the above Environmental Impact Appraisal.

ENCLOSURE 2

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

PROPOSED LICENSE AMENDMENT NO. TS 99-25
DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

I. DESCRIPTION OF THE PROPOSED CHANGE

TVA proposes to amend the SQN Units 1 and 2 Facility Operating Licenses (DPR-77 and -79) to specifically allow receipt at SQN of low-level radioactive waste (LLRW) from Watts Bar Nuclear Plant (WBN). This is accomplished by modifying License Provision Statement 2.B.(5) in each license, which currently states:

Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

to read as follows:

Pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the Sequoyah or Watts Bar Unit 1 Nuclear Plants.

II. REASON FOR THE PROPOSED CHANGE

TVA believes that License Provision Statement 2.B.(5) was intended, consistent with nonproliferation objectives, to restrict licensees from separating nuclides generated in the course of operation of the licensed facility; it was not intended to restrict licensees from possessing low-level by-product and special nuclear materials produced by operation of another facility. Nonetheless, TVA is requesting that License Provision Statement 2.B.(5) be modified as stated above to remove any question of interpretation with respect to receipt at Sequoyah of LLRW generated at Watts Bar Unit 1.

In response to increasingly expensive access and disposal fees, and the possible sudden closure of the Barnwell, South Carolina repository, TVA has evaluated its onsite storage

capabilities, including the refurbishment of existing on-site LLRW storage facility modules constructed at SQN in the early 1980s. TVA had envisioned the possibility of off-site disposal restrictions at that time and had designed the LLRW storage facility to have sufficient capacity to permit power operations to continue for the design life of the plant. The counterpart facility at WBN was never completed. However, reductions in radioactive waste volumes due to continuing process improvements at both SQN and WBN Unit 1 have resulted in the SQN facility having sufficient capacity to accept LLRW from both SQN and WBN Unit 1 for the life of all three units. Therefore, construction of a separate LLRW storage facility at WBN would be an unnecessary expense and burden to ratepayers.

III. Safety Analysis

In the early 1980s, an LLRW on-site storage facility (OSF) was constructed at SQN. TVA had envisioned the possibility of off-site disposal restrictions at that time and had designed the OSF to have sufficient capacity to permit power operations to continue for the life of the plant.

The NRC granted Materials License No. 41-08165-14 (and issued the accompanying Safety Evaluation Report and Environmental Impact Appraisal) on September 17, 1982 (Reference 3), for use of the OSF at SQN for a period of five years. However, consistent with the NRC policy of utilizing permanent off-site disposal whenever possible, LLRW shipments continued to be made to Barnwell and the OSF was not utilized. The materials license was renewed once prior to expiration, but on April 25, 1990, TVA requested its termination (Reference 4) since there were no plans for its use in the foreseeable future. The termination request noted that if use of the facility became necessary, TVA would not need to renew the materials license but would instead perform a 10 CFR 50.59 evaluation as allowed in Generic Letter 81-38, "Storage of Low-Level Radioactive Wastes at Power Reactor Sites."

Pursuant to 10 CFR 50.59, TVA has completed a safety analysis which addresses utilizing the existing LLRW OSF to accept radioactive wastes previously sent to the Barnwell facility. The safety analysis evaluated extended storage of LLRW resins in de-watered form and other radwaste material inside high integrity containers. The safety analysis justifies 88,500 curies as the total approved accumulated activity limit for on-site storage of radioactive waste within the OSF

structure. The total yearly generated activity stored in the facility shall not exceed 17,744 curies. These curie limitations, which are based on limiting the yearly cumulative exposure received by personnel handling LLRW, are stated in the original TVA application for a materials license (Reference 1) to store LLRW under 10 CFR Part 30. The safety analysis reviewed applicable design program requirements having the potential to affect nuclear safety as a result of the proposed change. It was concluded that nuclear safety would not be reduced by the proposed change.

The types of LLRW generated at WBN Unit 1 are very similar to those generated at SQN. Also, the total projected quantities (both in terms of volume and activity) for the SQN and WBN lifetimes are well within the storage capabilities of the SQN OSF facility. Therefore, receipt and storage of WBN LLRW at the SQN OSF is supported by the above safety analysis.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TVA has concluded that use of the SQN OSF for receipt and storage of radwaste from WBN, in accordance with the proposed change to the operating licenses, does not involve a significant hazards consideration. TVA's conclusion is based on its evaluation, in accordance with 10 CFR 90.91(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 probability of occurrence or the consequences for an accident or malfunction is not increased. Design basis accidents were previously analyzed by TVA and reviewed by NRC as part of the materials license process for the on-site storage facility (OSF). The intended future usage of the OSF is bounded by those analyses, with the exception of transport from WBN to SQN. Transport from WBN to SQN involves a distance of only 35 miles, which is very likely a small increment of the distance to any final off-site repository. For example, the 35-mile transit from WBN to SQN is much less than the 370-mile distance from WBN to Barnwell, South Carolina. The shipment of LLRW from WBN was reviewed as part of the WBN Unit 1 operating license request (WBN Final Safety Analysis Report [FSAR] Section 11.5.6). As with any shipment of low-level radioactive waste (LLRW), all Department of Transportation (DOT) requirements will be met.

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

A possibility for an accident or malfunction of a different type than any evaluated previously in SQN's FSAR is not created by the proposed change; nor is the possibility for an accident or malfunction of a different type. Potential accidents were previously analyzed by TVA and reviewed by NRC as part of the materials license process for the OSF. The intended future usage of the OSF is bounded by those analyses, with the exception of transport from WBN to SQN. Radwaste shipments from WBN to SQN will be no different than any other radwaste shipment except that the distance is only 35 miles. This transportation route does not present any significant potential negative impacts on the public health and safety. As with any shipment of LLRW, all DOT requirements will be met.

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

The proposed amendment will not involve a significant reduction in the margin of safety. The margin of safety was previously analyzed by TVA and reviewed by NRC as part of the materials license process for the OSF. The intended future usage of the OSF is bounded by those analyses, with the exception of transport from WBN to SQN. The transport route from WBN to SQN, which involves a distance of only 35 miles, does not present any significant potential negative impacts on the public health and safety is very likely a small increment of the distance to any final off-site repository. For example, this is much less than the distance to Barnwell. The shipment of LLRW from WBN was reviewed as part of the WBN Unit 1 operating license request (WBN FSAR Section 11.5.6). As with any shipment of LLRW, all DOT requirements will be met.

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. Potential environmental impacts were reviewed by NRC prior to issuance of Materials License No. 41-08165-14 for the SQN OSF. The types of LLRW generated at WBN Unit 1 are very similar to those generated at SQN. Also, the total projected quantities (both in terms of volume and activity) for the SQN and WBN

Unit 1 lifetimes are well within the original design storage capabilities of the SQN OSF facility. 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.

REFERENCES

1. Letter, L. M. Mills, Tennessee Valley Authority (TVA), to H. R. Denton, NRC, November 24, 1980. Re: Request for Amendment to Facility Operating License No. DPR-77.
2. Letter, L. M. Mills, TVA to L. C. Rouse, NRC, March 18, 1982. Re: Updated Amendment to TVA's November 24, 1980 application.
3. Materials License No. 41-08165-14, Docket No. 30-19101, granted to Tennessee Valley Authority on September 17, 1982, for its LLRW Storage Facility at SQN, as an Amendment to Facility Operating License No. DPR-77.
4. Letter, E. G. Wallace, Tennessee Valley Authority, to NRC, April 25, 1980. Re: Request for termination of Materials License No. 41-08165-14.

ENCLOSURE 3
TENNESSEE VALLEY AUTHORITY
SEQUOYAH PLANT (SQN)
UNITS 1 AND 2

PROPOSED LICENSE AMENDMENT NO. TS-99-25
MARKED PAGES

I. AFFECTED PAGE LIST

Unit 1, DPR-77, page 3

Unit 2, DPR-79, page 3

II. MARKED PAGES

See attached.

- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility Sequoyah or Watts Bar Unit 1 Nuclear Plants.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The Tennessee Valley Authority is authorized to operate the facility at reactor core power levels not in excess of 3411 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 248 are hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications.

(3) Initial Test Program

The Tennessee Valley Authority shall conduct the post-fuel-loading initial test program (set forth in Section 14 of Tennessee Valley Authority's Final Safety Analysis Report, as amended), without making any major modifications of this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:

- a. Elimination of any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- b. Modification of test objectives, methods or acceptance criteria for any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- c. Performance of any test at a power level different from there described; and

- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
 - (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility Sequoyah or Watts Bar Unit 1 Nuclear Plants
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The Tennessee Valley Authority is authorized to operate the facility at reactor core power levels not in excess of 3411 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 239 are hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications. R239

(3) Initial Test Program

The Tennessee Valley Authority shall conduct the post-fuel-loading initial test program (set forth in Section 14 of Tennessee Valley Authority's Final Safety Analysis Report, as amended), without making any major modifications of this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:

- a. Elimination of any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- b. Modification of test objectives, methods or acceptance criteria for any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- c. Performance of any test at a power level different from there described; and

- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the Sequoyah or Watts Bar Unit 1 Nuclear Plants.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The Tennessee Valley Authority is authorized to operate the facility at reactor core power levels not in excess of 3411 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 248 and are hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications.

| R252

(3) Initial Test Program

The Tennessee Valley Authority shall conduct the post-fuel-loading initial test program (set forth in Section 14 of Tennessee Valley Authority's Final Safety Analysis Report, as amended), without making any major modifications of this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:

- a. Elimination of any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- b. Modification of test objectives, methods or acceptance criteria for any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- c. Performance of any test at a power level different from there described; and

- (4) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the Sequoyah and Watts Bar Unit 1 Nuclear Plants.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

The Tennessee Valley Authority is authorized to operate the facility at reactor core power levels not in excess of 3411 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 239 are hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications.

|R239

(3) Initial Test Program

The Tennessee Valley Authority shall conduct the post-fuel-loading initial test program (set forth in Section 14 of Tennessee Valley Authority's Final Safety Analysis Report, as amended), without making any major modifications of this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:

- a. Elimination of any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- b. Modification of test objectives, methods or acceptance criteria for any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- c. Performance of any test at a power level different from there described; and

ENCLOSURE 4
TENNESSEE VALLEY AUTHORITY
SEQUOYAH PLANT (SQN)
UNITS 1 AND 2

PROPOSED LICENSE AMENDMENT NO. TS-99-25
REVISED PAGES

I. AFFECTED PAGE LIST

Unit 1, DPR-77, page 3

Unit 2, DPR-79, page 3

II. REVISED PAGES

See attached.