



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37384-2000

October 31, 2001

TVA-SQN-TS-01-11

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) - UNITS 1 AND 2 - APPLICATION
FOR TECHNICAL SPECIFICATION (TS) IMPROVEMENT TO ELIMINATE
REQUIREMENTS FOR POST ACCIDENT SAMPLING SYSTEM (PASS) USING
THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP) - TS
CHANGE NO. 01-11**

In accordance with the provisions of 10 CFR 50.90, TVA is submitting a request for an amendment to Sequoyah's Licenses DPR-77 and 79 to change the TSs for Units 1 and 2. The proposed amendment deletes the program requirements of TS 6.8.4.e, "Post Accident Sampling." The changes are consistent with NRC approved Industry/Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System." The availability of this TS improvement was announced in the *Federal Register* on October 31, 2000, as part of the CLIIP.

TVA proposes to eliminate the requirements for PASS in 3 steps.

Step 1: Eliminate PASS from the TSs and incorporate the modified requirements listed as commitments in Enclosure 4 of this letter to the Final Safety

Analysis Report (FSAR) within 60 days of NRC approval of the subject amendment. Continue current post accident sampling and analysis capability through the PASS facility (hardware unchanged) until the design basis is changed through the formal design change process.

Step 2: If economically justified, modify plant documents for post accident sampling requirements based on implementation of WCAP-14986, Revision 1.

Step 3: If economically justified, implement a design change to remove or abandon the current PASS facility and equipment from plant use in accordance with the TVA project approval and design change process. The modified sampling requirement in Enclosure 4 would remain in the FSAR as regulatory commitments.

TVA has determined that there are no significant hazards considerations associated with the proposed change and that the change is exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). The SQN Plant Operations Review Committee and the SQN Nuclear Safety Review Board have reviewed this proposed change and determined that operation of SQN Units 1 and 2, 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.

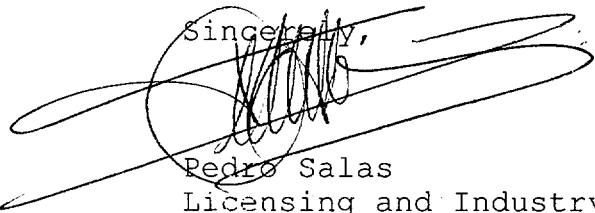
Enclosure 1 provides the description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. This includes the determination that the proposed change does not involve a significant hazards consideration, and is exempt from environmental review. Enclosure 2 contains copies of the appropriate TS pages from Units 1 and 2 marked up to show the proposed change. Enclosure 3 forwards the revised TS pages for Units 1 and 2 which incorporate the proposed change. Enclosure 4 provides a list of commitments made in this letter.

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TVA currently has no specific need date for approval of the proposed license amendment. The revised TS will be made effective within 60 days of NRC approval. This letter is being sent in accordance with NRC RIS 2001-05.

If you have any questions about this change, please telephone me at (423) 843-7170 or R. M. Brown at (423) 751-7228.

Sincerely,



Pedro Salas
Licensing and Industry Affairs Manager

Subscribed and sworn to before me
on this 31st day of October



Greg M. Billingsley
Notary Public

My Commission Expires October 9, 2002

Enclosures

ENCLOSURE 1

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

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE NO. 01-11
DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

I. DESCRIPTION OF THE PROPOSED CHANGE

The proposed License amendment deletes the program requirements of TS 6.8.4.e, "Post Accident Sampling System (PASS)." This section of the TSs currently reads as follows:

6.8.4.e, Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;*
- b. Procedures for sampling and analysis;
and*
- c. Provisions for maintenance of sampling
and analysis equipment.*

The proposed amendment is consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. As part of the requested amendment, TVA is not proposing any significant variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000. The availability of this TS improvement was announced in the *Federal Register*, Volume 65, No. 211, on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP).

II. REASON FOR THE PROPOSED CHANGE

The requested amendment has been proposed to take advantage of TSTF-366 using the CLIIP proposed by the NRC on this issue. TVA considers the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to SQN Units 1 and 2 and sufficiently justify the amendment.

III. SAFETY ANALYSIS

TVA has performed a review of the safety evaluation published on October 31, 2000, as part of the CLIIP. This included a review of the NRC staff's evaluation, as well as the supporting information provided for TSTF-366 (i.e., WCAP-14986-A, Revision 1, "Post Accident Sampling System Requirements": A Technical Basis, submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10 and May 22, 2000). Based on the review, TVA considers the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff to be applicable to SQN Units 1 and 2 and sufficiently justify this amendment.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TVA has reviewed the no significant hazards consideration determination published on October 31, 2000, as part of the Consolidated Line Item Improvement Process (CLIIP). TVA has concluded that the determination presented in the notice is applicable to SQN and the determination is hereby incorporated by reference.

TVA has concluded that operation of SQN Units 1 and 2, in accordance with the proposed change to the TS, does not involve a significant hazards consideration.

V. COMMITMENTS

As discussed in the notice of availability published in the *Federal Register* on October 31, 2000, for this TS improvement, plant-specific verifications will be performed as described below and the FSAR will be revised accordingly:

1. TVA will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in technical procedures and implemented in accordance with the proposed License amendment.

2. The capability for classifying fuel damage events at the Alert level threshold will be established at radioactivity levels of greater than or equal to 300 $\mu\text{Ci/gm}$ dose equivalent iodine. This capability will be described in emergency plan implementing procedures.
3. TVA will establish the capability to monitor radioactive iodines that have been released to offsite environs. This capability will be described in chemistry and radiation protection implementing procedures.

The procedures discussed above will be developed and/or revised as necessary in conjunction with implementation of the design change for eliminating PASS from the plant.

VI. ENVIRONMENTAL IMPACT CONSIDERATION

TVA has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000, as part of the CLIIP. TVA has concluded that the staff's findings presented in that evaluation are applicable to SQN and the evaluation is hereby incorporated by reference for this application.

VII. REFERENCES

1. Industry/TSTF Standard Technical Specification Changes Traveler TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)."
2. *Federal Register*, Volume 65, No. 211, "Notice of Availability for Referencing in License Amendment Applications Model Safety Evaluation on Technical Specification Improvement to Eliminate Requirements on Post Accident Sampling Systems using the Consolidated Line Item Improvement Process," dated October 31, 2000.
3. Westinghouse Owners Group (WOG) topical report WCAP-14986A, Rev. 1, "Post Accident Sampling System Requirements: A Technical Basis," July 2000.

ENCLOSURE 2

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

**PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE
MARKED PAGES**

I. AFFECTED PAGE LIST

UNIT 1

6-9

UNIT 2

6-8

II. MARKED PAGES

See attached.

ADMINISTRATIVE CONTROLS

d. DELETED

DELETED

e. Post Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for sampling and analysis,
- (iii) Provisions for maintenance of sampling and analysis equipment.

f. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and set-point determination in accordance with the methodology in the ODCM,
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentrations stated in 10 CFR 20.1001-20.2401, Appendix B, Table 2, Column 2,
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,

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DELETED

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- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases

ENCLOSURE 3

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

**PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE
REVISED PAGES**

I. AFFECTED PAGE LIST

UNIT 1

6-9

UNIT 2

6-8

II. REVISED PAGES

See attached.

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e. DELETED

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ENCLOSURE 4

LIST OF COMMITMENTS

As discussed in the notice of availability published in the *Federal Register* on October 31, 2000, for this TS improvement, plant-specific verifications will be performed as described below and the Final Safety Analysis Report will be revised accordingly:

1. TVA will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in technical procedures and implemented in accordance with the License amendment.
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