



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

November 17, 2005

TVA-SQN-TS-04-06, Revision 1

10 CFR 50.90

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

Gentlemen:

In the Matter of)	Docket Nos. 50-327
Tennessee Valley Authority)	50-328

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - TECHNICAL SPECIFICATIONS (TS) CHANGE 04-06, REVISION 1 - "RELOCATION OF SPECIFICATIONS IN ACCORDANCE WITH PART 50.36 IN TITLE 10 OF THE CODE OF FEDERAL REGULATIONS (CFR)"

Reference: TVA letter to NRC dated April 27, 2005,
"Sequoyah Nuclear Plant (SQN) - Units 1 and 2 -
Technical Specifications (TS) Change 04-06, -
Relocation of Specifications in Accordance with
Part 50.36 in Title 10 of the Code of Federal
Regulations (CFR)"

Tennessee Valley Authority (TVA) is submitting a request to revise referenced TS change (TS-04-06) to Licenses DPR-77 and DPR-79 for SQN Units 1 and 2. The referenced TS change proposes the relocation of provisions for Rod Drop Time, Movable Incore Detectors, Meteorological Instrumentation, Reactor Coolant System Chemistry, Reactor Coolant System Head Vents, Steam Generator Pressure and Temperature Limitation, Sealed Source Contamination, Refueling

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Operations Communications, and Manipulator Crane. These provisions are found in TS Sections 3.1.3.4, 3.3.3.2, 3.3.3.4, 3.4.7, 3.4.11, 3.7.2, 3.7.10, 3.9.5, and 3.9.6, respectively. These specifications do not meet the four criterion found in 10 CFR 50.36 and can be removed from the TSs. These specifications were to be relocated to the Technical Requirements Manual (TRM) without change to the current TS requirements.

During subsequent discussions with the NRC, it was discovered that the surveillance associated with the rod drop time had been recommended for retention in the TSs in Specification 3.1.3.1, "Movable Control Assemblies - Group Height." This recommendation was contained in NRC's response to the industry's criteria application report dated May 9, 1988. SQN has not converted to the latest version of standard TSs (NUREG-1431) and therefore differs in requirements currently contained in Specification 3.1.3.1. Because of these differences and the additional changes that would be required, TVA is not proposing the addition of the rod drop surveillance to this specification at this time. TVA proposes, in this revision, the retention of Specification 3.1.3.4 without change.

This revision to the original request will remove the deletion of the Specification 3.1.3.4, "Rod Drop Time." The other relocations proposed in the original request are not altered by this revision. This revision does not affect the basis for this TS change in the referenced letter with respect to the other specifications proposed for relocation. The TS page mark-ups included in the original submittal remains accurate with only the removal of page 3/4 1-19 associated with Specification 3.1.3.4 no longer being applicable and the removal of Index page IV that originally showed the rod drop specification to be deleted. In addition, Bases page B 3/4 1-4a will no longer be applicable to the TS change request as it was also associated with the rod drop relocation that is no longer being proposed.

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TVA has determined that the original no significant hazards considerations associated with the proposed change continues to bound this revision as this change only reduces the scope of the proposed change by removing the rod drop specification. Retaining this specification in the TSs does not invalidate the responses to the previous no significant hazards considerations. Therefore, TVA is not proposing any change to the previously submitted evaluation. The revised TS change continues to qualify for categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9) as the revision only reduces that original scope of relocated specifications. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosure to the Tennessee State Department of Public Health.

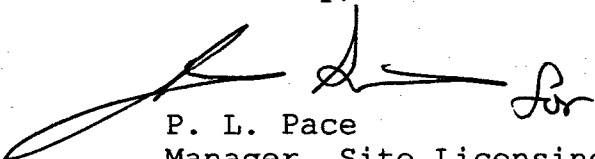
TVA does not have specific scheduling needs for the proposed revised TS change and processing can be pursued at NRC's discretion. TVA requests that the implementation of the revised TS be within 45 days of NRC approval.

There are no commitments contained in this submittal.

If you have any questions about this revised change, please contact me at 843-7170 or Jim Smith at 843-6672.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 17th day of November, 2005.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. L. Pace', is written over the typed name.

P. L. Pace
Manager, Site Licensing and
Industry Affairs

cc: See page 4

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