

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 4, 1981

Director of Nuclear Reactor Regulation  
Attention: Ms. E. Adensam, Chief  
Licensing Branch No. 4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



Dear Ms. Adensam:

In the Matter of )  
Tennessee Valley Authority )

Docket No. 50-328

In section 5.2.2.4 of the Sequoyah Nuclear Plant Final Safety Analysis Report (FSAR), TVA committed to implement a system for control of Reactor Coolant System (RCS) pressure during low temperature operation before unit 2 fuel loading. During preoperational testing of the system, a problem with the response times for the pressurizer relief valves (PRV) was identified (reference nonconformance report SQNNEB8122). TVA determined that corrective action for this condition would be required before initial criticality. However, the modifications implemented at this time have not produced the required PRV response time. Therefore, we propose to delay full implementation the RCS Low Temperature Overpressure Protection System until the first unit 2 refueling outage. The deferral of this system does not represent a reduction in available plant safety margins for the following reasons:

1. For Sequoyah unit 1, a special alarm was added to notify the operator in the main control room of water solid conditions when RCS pressure exceeds 380 lb/in<sup>2</sup>g. The overpressure protection circuitry installed in unit 2 provides the same alarm capability. It should be noted that unlike the unit 1 alarm, the RCS pressure alarm for unit 2 actuates when the pressure rises to within 20 lb/in<sup>2</sup> of the programmed setpoint, (which varies as a function of temperature) of the PRV's.
2. Operator training and administrative procedure changes are the same for units 1 and 2 and have been implemented.

3001  
5  
1/1

8109110458 810504  
PDR ADOCK 05000328  
PDR

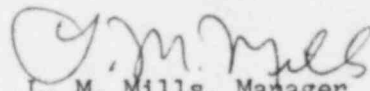
Ms. E. Adensam, Chief

September 4, 1981

3. The NRC staff, in Supplement No. 1 of the Sequoyah Safety Evaluation report, concluded that since no credible overpressure transient could damage the reactor vessel during the first operating cycle (based on expected minimal neutron damage to the vessel), full implementation of the RCS Low Temperature Overpressure Protection System could be deferred until the first refueling outage. We believe that the same technical justifications can be applied to unit 2.

Very truly yours,

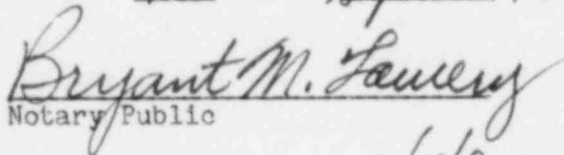
TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Regulation and Safety

Subscribed and sworn to before

me this 4<sup>th</sup> day of Sept 1981.

  
Notary Public

My Commission Expires 4/4/82

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 4, 1981

Director of Nuclear Reactor Regulation  
Attention: Ms. E. Adensam, Chief  
Licensing Branch No. 4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Ms. Adensam:

In the Matter of )  
Tennessee Valley Authority )

Docket No. 50-328

In section 5.2.2.4 of the Sequoyah Nuclear Plant Final Safety Analysis Report (FSAR), TVA committed to implement a system for control of Reactor Coolant System (RCS) pressure during low temperature operation before unit 2 fuel loading. During preoperational testing of the system, a problem with the response times for the pressurizer relief valves (PRV) was identified (reference nonconformance report SQNNEB8122). TVA determined that corrective action for this condition would be required before initial criticality. However, the modifications implemented at this time have not produced the required PRV response time. Therefore, we propose to delay full implementation the RCS Low Temperature Overpressure Protection System until the first unit 2 refueling outage. The deferral of this system does not represent a reduction in available plant safety margins for the following reasons:

1. For Sequoyah unit 1, a special alarm was added to notify the operator in the main control room of water solid conditions when RCS pressure exceeds 380 lb/in<sup>2</sup>g. The overpressure protection circuitry installed in unit 2 provides the same alarm capability. It should be noted that unlike the unit 1 alarm, the RCS pressure alarm for unit 2 actuates when the pressure rises to within 20 lb/in<sup>2</sup> of the programmed setpoint (which varies as a function of temperature) of the PRV's.
2. Operator training and administrative procedure changes are the same for units 1 and 2 and have been implemented.

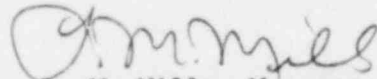
Ms. E. Adensam, Chief

September 4, 1981

3. The NRC staff, in Supplement No. 1 of the Sequoyah Safety Evaluation report, concluded that since no credible overpressure transient could damage the reactor vessel during the first operating cycle (based on expected minimal neutron damage to the vessel), full implementation of the RCS Low Temperature Overpressure Protection System could be deferred until the first refueling outage. We believe that the same technical justifications can be applied to unit 2.

Very truly yours,

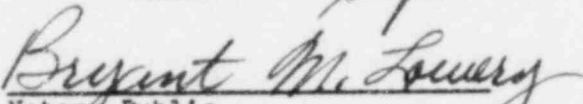
TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Regulation and Safety

Subscribed and sworn to before

me this 4<sup>th</sup> day of Sept 1981

  
Notary Public

My Commission Expires 4/4/82

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

September 4, 1981

Director of Nuclear Reactor Regulation  
Attention. Ms. E. Adensam, Chief  
Licensing Branch No. 4  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Ms. Adensam:

In the Matter of )  
Tennessee Valley Authority )

Docket No. 50-328

In section 5.2.2.4 of the Sequoyah Nuclear Plant Final Safety Analysis Report (FSAR), TVA committed to implement a system for control of Reactor Coolant System (RCS) pressure during low temperature operation before unit 2 fuel loading. During preoperational testing of the system, a problem with the response times for the pressurizer relief valves (PRV) was identified (reference nonconformance report SQNNE98122). TVA determined that corrective action for this condition would be required before initial criticality. However, the modifications implemented at this time have not produced the required PRV response time. Therefore, we propose to delay full implementation the RCS Low Temperature Overpressure Protection System until the first unit 2 refueling outage. The deferral of this system does not represent a reduction in available plant safety margins for the following reasons:

1. For Sequoyah unit 1, a special alarm was added to notify the operator in the main control room of water solid conditions when RCS pressure exceeds 380 lb/in<sup>2</sup>g. The overpressure protection circuitry installed in unit 2 provides the same alarm capability. It should be noted that unlike the unit 1 alarm, the RCS pressure alarm for unit 2 actuates when the pressure rises to within 20 lb/in<sup>2</sup> of the programmed setpoint (which varies as a function of temperature) of the PRV's.
2. Operator training and administrative procedure changes are the same for units 1 and 2 and have been implemented.

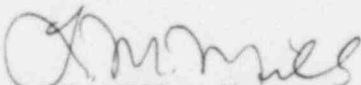
Ms. E. Adensam, Chief

September 4, 1981

3. The NRC staff, in Supplement No. 1 of the Sequoyah Safety Evaluation report, concluded that since no credible overpressure transient could damage the reactor vessel during the first operating cycle (based on expected minimal neutron damage to the vessel), full implementation of the RCS Low Temperature Overpressure Protection System could be deferred until the first refueling outage. We believe that the same technical justifications can be applied to unit 2.

Very truly yours,

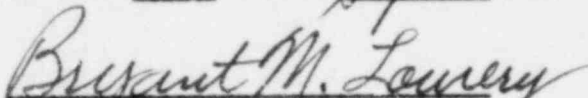
TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Regulation and Safety

Subscribed and sworn to before

me this 4<sup>th</sup> day of Sept 1981

  
Notary Public

My Commission Expires 4/4/82