

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-93-01)

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- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor coolant system leakage through a steam generator to the secondary system.

MEMBER(S) OF THE PUBLIC

1.17 MEMBERS OF THE PUBLIC shall include all individuals who are not occupationally associated with the plant. This category shall include non-employees of the licensee who are permitted to use portions of the site for recreational, occupational, or other purposes not associated with plant functions. This category does not include non-employees such as vending machine servicemen or postmen who, as part of their formal job function, occasionally enter an area that is controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

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OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.18 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.5 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and ~~Semiannual~~ Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.8.

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OPERABLE - OPERABILITY

1.19 A system, subsystem, train, or component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, a normal and an emergency electrical power source, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

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OPERATIONAL MODE - MODE

1.20 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level and average reactor coolant temperature specified in Table 1.1.

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PHYSICS TESTS

1.21 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and 1) described in Chapter 14.0 of the FSAR, 2) authorized under the provisions of 10 CFR 50.59, or 3) otherwise approved by the Commission.

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(describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

If the results of specific activity analysis in which the primary coolant exceeded the limits of specification 3.4.8.a, then the following information shall be included along with the results of specific activity analysis results in which the primary coolant exceeded the limits of the specifications:

(1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

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ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT^{1/}

6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

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6.9.1.7 (Relocated to the ODCM.)

ANNUAL SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT^{1/}

6.9.1.8 The ~~Semiannual~~ ^{ANNUAL} Radioactive Effluent Release Report covering the operation of the unit during the previous ~~6 months~~ ¹² of operation shall be submitted ~~within 60 days after January 1 and July 1 of each year.~~ The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

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6.9.1.9 (Relocated to the ODCM or PCP.)

ANNUALLY. THE TIME BETWEEN
SUBMISSION OF REPORTS MUST BE
NO LONGER THAN 12 MONTHS.

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.p. This documentation shall contain:
 - a. sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - b. a determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
2. Shall become effective after review and approval in accordance with Section 6.5.1A.

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6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.p. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
2. Shall become effective after review and acceptance by the SQN RARC.
3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the ~~Semiannual~~ Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

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ADMINISTRATIVE CONTROLS

6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS (Liquid, Gaseous and Solid)

6.15.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid):*

1. Shall be reported to the Commission in the ~~Year~~^{DATE} Annual Radioactive Effluent Release Report for the period in which the evaluation was reviewed in accordance with Section 6.5.1A. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - b. sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. a detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. an evaluation for the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e. an evaluation of the change which shows the expected maximum exposures to individual in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. a comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. an estimate of the exposure to plant operating personnel as a result of the change; and
 - h. documentation of the fact that the change was reviewed and found acceptable in accordance with Section 6.5.1A.
2. Shall become effective upon review and acceptance in accordance with Section 6.5.1A.

*Submittal of information required by this section may be made as part of the annual FSAR update.

DEFINITIONS

IDENTIFIED LEAKAGE

1.16 IDENTIFIED LEAKAGE shall be:

- a. Leakage (except CONTROLLED LEAKAGE) into closed systems, such as pump seal or valve packing leaks that are captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE, or
- c. Reactor coolant system leakage through a steam generator to the secondary system.

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MEMBERS OF THE PUBLIC

1.17 MEMBERS OF THE PUBLIC shall include all individuals who are not occupationally associated with the plant. This category shall include non-employees of the licensee who are permitted to use portions of the site for recreational, occupational, or other purposes not associated with plant functions. This category does not include non-employees such as vending machine servicemen or postmen who, as part of their formal job function, occasionally enter an area that is controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

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OFFSITE DOSE CALCULATION MANUAL

1.18 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.5 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and ~~Semiannual~~ Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.8.

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ANNUAL

OPERABLE - OPERABILITY

1.19 A system, subsystem, train, or component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, a normal and an emergency electrical power source, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

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ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT^{1/}

6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

6.9.1.7 (Relocated to the ODCM.)

~~SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT^{1/}~~

6.9.1.8 The ~~Semiannual~~ Radioactive Effluent Release Report covering the operation of the unit during the previous ~~6~~ months of operation shall be submitted ~~within 60 days after January 1 and July 1 of each year.~~ The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

6.9.1.9 (Relocated to the ODCM or PCP.)

ANNUALLY. THE TIME BETWEEN SUBMISSION OF REPORTS
MUST BE NO LONGER THAN 12 MONTHS.

^{1/} A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2p. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - b. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
2. Shall become effective after review and approval in accordance with Section 6.5.1A.

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6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2p. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
2. Shall become effective after review and acceptance by the SQN RARC.
3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the ~~Semiannual~~ Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

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ADMINISTRATIVE CONTROLS

6.15 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS (Liquid, Gaseous and Solid)

6.15.1 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid):*

1. Shall be reported to the Commission in the ~~Annual~~^{Quarterly} Annual Radioactive Effluent Report for the period in which the evaluation was reviewed in accordance with Section 6.5.1A. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - b. sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. a detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. an evaluation for the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e. an evaluation of the change which shows the expected maximum exposures to individual in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. a comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. an estimate of the exposure to plant operating personnel as a result of the change; and
 - h. documentation of the fact that the change was reviewed and found acceptable in accordance with Section 6.5.1A.
2. Shall become effective upon review and acceptance in accordance with Section 6.5.1A.

*Submittal of information required by this section may be made as part of the annual FSAR update.

ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-93-01)

DESCRIPTION AND JUSTIFICATION FOR

REVISION OF RADIOACTIVE EFFLUENT RELEASE REPORT FREQUENCY

Description of Change

TVA proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 technical specifications (TSs) to revise Section 6.0, Administrative Controls, to increase the interval for submittal of radioactive effluent release reports under 10 CFR 50.36a(a)(2) from semiannually to annually as follows:

Definition 1.18, Offsite Dose Calculation Manual (ODCM), page 1-4

Change "Semiannual" to "Annual" in the last sentence so that it reads: "The ODCM shall also . . . the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.8."

Section 6.9.1.8, Unit 1, page 6-20 and Unit 2, page 6-21

Change heading "SEMIANNUAL" to "ANNUAL"

Change first sentence to read: "The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted annually." After the first sentence add the following, "The time between submission of report must be no longer than 12 months."

Section 6.14.1.3, Unit 1, page 6-25 and Unit 2, page 6-26

Change "Semiannual" to "Annual" in the first sentence so that it reads:

"Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made."

Section 6.15.1.1, Unit 1, page 6-26 and Unit 2, page 6-27

Change "Semi-Annual" to "Annual" in the first sentence so that it reads:

"Shall be reported to the Commission in the Annual Radioactive Effluent Release Report for the period in which the evaluation was reviewed in accordance with Section 6.5.1A."

Reason for Change

The reason for the proposed change is to revise SQN TS reporting requirements associated with the radioactive effluent release report to be consistent with the August 31, 1992, NRC revision to regulations as published in the Federal Register (57 FR 39353). This NRC action was taken in response to a presidential memorandum requesting federal agencies review and modify regulations that would eliminate unnecessary burden of governmental regulation. NRC's committee to review generic requirements identified this as one of eight areas where regulations could be revised to reduce the regulatory burden, without reducing the protection for public health and safety or the common defense and security.

Justification for Change

On August 31, 1992, NRC issued revisions to regulations (57 FR 39353) that increased the interval for submittal of radiological effluent reports under 10 CFR 50.36a from semiannually to annually. This requested change is administrative in nature in that the purpose is to incorporate NRC-approved changes that are intended to reduce the regulatory burden on licensees. In response to comment No. 8 in the Federal Register Notice (57 FR 39353), NRC responded: "The proposed amendments are generic and licensee may request administrative amendments to any conflicting license condition or technical specification as needed."

Environmental Impact Evaluation

The proposed change request does not involve an unreviewed environmental question because operation of SQN Units 1 and 2 in accordance with this change would not:

1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by NRC's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or decisions of the Atomic Safety and Licensing Board.
2. Result in a significant change in effluents or power levels.
3. Result in matters not previously reviewed in the licensing basis for SQN that may have a significant environmental impact.

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-93-01)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Significant Hazards Evaluation

TVA has evaluated the proposed technical specification (TS) change and has determined that it does not represent a significant hazards consideration based on criteria established in 10 CFR 50.92(c). Operation of Sequoyah Nuclear Plant (SQN) in accordance with the proposed amendment will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes proposed are administrative, intended to implement changes to regulations, and reduce the regulatory burden on licensees. There is no effect on the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

The changes are administrative only, therefore they do not create the possibility of a new or different kind of accident.

3. Involve a significant reduction in a margin of safety.

The margin of safety as defined in the basis for the technical specifications has not been affected because no margin of safety is defined for the administrative controls section of the TS.