ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-93-16)

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(23) TMI Action Plan Dated Conditions

Each of the following conditions shall be completed to the satisfaction of the NRC by the times indicated:

A. Shift Technical Advisor (Section 22.3, I.A.1.1)

TVA shall continue to provide an on-shift technical advisor to the shift supervisor. OPERATIONS

All STAs shall be fully trained no later than by January 1, 1981. STAs shall complete eight weeks of mathematics, physics, thermodynamics, fluid flow, heat transfer, instrumentation and control, chemistry, materials and structural analysis. Following this, STAs shall receive two weeks of design review and five weeks of systems dynamic behavior including transient analysis and techniques for transient identification. The training program for engineers designated as STAs shall consist of three portions: academic training in thermodynamics, fluid flow, heat transfer and reactor theory; specific instruction in plant systems and Technical Specifications; and finally, simulator training.

The training shall be taught at the college level and be equivalent to about 60 semester hours.

Items for completion by January 1, 1981:

B. Plant Shielding (Section 22.3, II.B.2)

TVA shall complete modification to assure adequate access to vital areas and protection of safety equipment following an accident resulting in a degraded core.

C. Auxiliary Feedwater Initiation and Indication (Section 22.3, II.E.1.2)

(a) TVA shall upgrade, as necessary, automatic initiation of the auxiliary feedwater system to safety-grade quality.

(b) TVA shall upgrade, as necessary, the indication of auxiliary feedwater flow to each steam generator to safety grade quality.

D. Additional Accident Monitoring Instrumentation (Section 22.3, II.F.1)

R14 (1) TVA shall install interim noble gas monitors at the first outage of sufficient duration.

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. R159 R75

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 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.8. R159 R152 R173

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). R159

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. R159

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. R159

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence. R62

~~6.1.2 The Corporate Manager of Radiological Control shall be responsible for implementing the radiological environmental program and dose calculations and projections as described in the Offsite Dose Calculation Manual (ODCM).~~ R156

OPERATIONS

6.1.~~2~~2 The Shift Supervisor (or during his absence from the Control Room, a designated individual) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Site Vice President, shall be reissued to all station personnel on an annual basis. R62 R156

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR and will be updated in accordance with 10 CFR 50.71(e).

b. The Senior Vice President, Nuclear ~~Group~~ Power shall have corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured. R78

c. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 FACILITY STAFF

a. Each on-duty unit shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

b. At least one licensed Reactor Operator shall be in the unit Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room. R78

AUG

c. A Radiological Control technician# shall be onsite when fuel is in the reactor.

d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Oper tor or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation. FP

e. A Fire Brigade of at least 5 members shall be maintained onsite at all times.# The Fire Brigade shall not include the Shift Supervisor and 2 other members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency. OPERATIONS R62

f. The Operations Superintendent shall hold a Senior Reactor Operator license. R

g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (i.e., senior reactor operators, reactor operators, assistant unit operators, Radiological Control, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintanance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.

2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time. R156

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

REPLACE WITH INSERT A

~~Any deviation from the above guidelines shall be authorized by the Plant Manager (or Duty Plant Manager), or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.~~ Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

#The Radiological Control technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

INSERT A

Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Table 6.2-1
MINIMUM SHIFT CREW COMPOSITION WITH
UNIT 2 IN MODE 5 OR 6 OR DE-FUELED

Position	Number of individuals required to fill position	
	Modes 1, 2, 3, & 4	Modes 5 & 6
SOS ~~SS~~	1[a]	1[a]
SRO	1	None
RO	2	1
AO	2	2[b]
STA	1	None

With Unit 2 in Modes 1, 2, 3, or 4

Postion	Number of individuals required to fill position	
	Modes 1, 2, 3, & 4	Modes 5 & 6
SOS ~~SS~~	1[a]	1[a]
SRO	1[a]	None
RO	2[b]	1
AO	2[b]	1
STA	1[a]	None

[a] Individual may fill the same position on Unit 2.

[b] One of the two required individuals may fill the same position on Unit 2.

TABLE 6.2-1 (Continued)

TABLE NOTATION

SOS OPERATIONS - Shift Supervisor with a Senior Reactor Operators License on Unit 1
SRO - Individual with a Senior Reactor Operators License on Unit 1
RO - Individual with a Reactor Operators License on Unit 1
AO - Auxiliary Operator
STA - Shift Technical Advisor

Except for the OPERATIONS Shift Supervisor, the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent. R16

During any absence of the OPERATIONS Shift Supervisor from the Control Room while the unit is in MODE 1, 2, 3 or 4, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During any absence of the Shift Supervisor from the Control Room while the Unit is in Mode 5 or 6, an individual with a valid SRO or RO license (other than the Shift Technical Advisor) shall be designated to assume the Control Room command function.

OPERATIONS

6.2.3 INDEPENDENT SAFETY ENGINEERING (ISE)

FUNCTION

6.2.3.1 The ISE shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety. R123

COMPOSITION

6.2.3.2 The ISE shall be composed of at least 3 dedicated full-time engineers located onsite. These engineers will be supplemented as necessary by full-time engineers shared among all TVA nuclear sites to achieve an equivalent staffing of 5 full-time engineers performing the ISE functions applicable to Sequoyah.

RESPONSIBILITIES

6.2.3.3 The ISE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Manager, Nuclear Experience Review/Independent Safety Engineering. R16

6.2.4 SHIFT TECHNICAL ADVISOR (STA)

6.2.4.1 The STA shall serve in an advisory capacity to the OPERATIONS Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit. R156 R16

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the Site Radiological Control Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. R167 R156

*Not responsible for sign-off function.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Plant Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55 and shall include familiarization with relevant industry operational experience. | R156 R167

6.5 REVIEW AND AUDIT

6.5.0 The Senior Vice President, Nuclear Power is responsible for the safe operation of all TVA power plants. | R78

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety. | R62

COMPOSITION

6.5.1.2 The PORC ~~shall be composed~~ of the:

Chairman:	Plant Manager	
Member:	Operations Manager	
Member:	~~Site~~ Radiological ~~Control~~ Manager (AND CHEMISTRY)	R156
Member:	Maintenance Manager	
Member:	Technical Support Manager	
Member:	Quality Audit and ~~Monitoring~~ Manager (ASSESSMENT)	
Member:	~~Nuclear~~ SITE Engineering Representative	R167

h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant Manager or the Nuclear Safety Review Board. R62

i. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Site Vice President and to the Nuclear Safety Review Board. R15

j. Review Of All Proposed Changes To The OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

6.5.1.7 The PORC shall:

a. Recommend in writing to the Plant Manager approval or disapproval of items considered under 6.5.1.6(a), (b) and (c) above. R62

b. Require a determination in writing with regard to whether or not each item considered under 6.5.1.6(b), (c), and (e) above constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the Site Vice President and the Nuclear Safety Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above. R15

RECORDS R62

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Site Vice President and the Nuclear Safety Review Board. R15

6.5.1A TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.1A.1. Activities which affect nuclear safety shall be conducted as follows:

a. Procedures required by Specification 6.8.1 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual other than the individual who prepared the procedure or procedure change, but who may be from the same organization as the individual who prepared the procedure or procedure change. Procedures shall be approved by the appropriate responsible manager as designated in writing by the Plant Manager. The Plant Manager, or Duty Plant Manager shall approve designated Administrative Procedures. R62 R156

f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.

g. All REPORTABLE EVENTS. R62

h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.

i. Reports and meetings minutes of the PORC, ~~and the SQN RARC.~~ R62

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.

b. The performance, training and qualifications of the entire facility staff at least once per 12 months. R78

c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.

d. The performance of activities required by the ~~Operational~~ NUCLEAR Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.

e. The Site Radiological Emergency Plan and implementing procedures at least once per 12 months.

f. The Plant Physical Security Plan, the Safeguards Contingency Plan, and implementing procedures at least once per 12 months.

g. Any other area of unit operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power. R78

h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.

i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.

j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

m. The PROCESS CONTROL PROGRAM and implementing procedures for SOLIDIFICATION of radioactive wastes at least once per 24 months.

n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975, at least once per 12 months. | R46

AUTHORITY

6.5.2.9 The NSRB shall report to and advise the Senior Vice President, Nuclear Power those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8. | R78

RECORDS

6.5.2.10 Records of NSRB activities shall be prepared, approved and distributed as indicated below:

a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following each meeting. | R78

b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following completion of the review. | R78

c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power and to the management positions responsible for the areas audited within 30 days after completion of the audit. | R78

THIS SPECIFICATION IS DELETED

6.5.3 ~~RADIOLOGICAL ASSESSMENT REVIEW COMMITTEE (RARC)~~

~~Function~~

~~6.5.3.1 The SQN RARC shall function to advise the Corporate Manager of Radiological Control and the Plant Manager on all matters related to radiological assessments involving dose calculations and projections and environmental monitoring.~~ | R156 | R62

~~Composition~~

~~6.5.3.2 The SQN RARC shall be composed of the:~~

~~Chairman: Technical Assistance Section Supervisor~~
~~Member: Health Physicist, Gaseous, Radiological Control~~
~~Member: Health Physicist, Liquid, Radiological Control~~ | R62

AUG 9 9 | R78

Member: ~~Meteorologist, Air Quality Branch~~
Member: Chemical Engineer, Chemistry Section, SQN
Member: Health Physicist, Environmental Monitoring, Radiological Control

Alternates

6.5.3.3 All alternate members shall be appointed in writing by the SQN RARC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SQN RARC activities at any one time.

Meeting Frequency

6.5.3.4 The SQN RARC shall meet at least once per six months or as requested by the SQN RARC Chairman, his designated alternate, or a plant representative.

Quorum

6.5.3.5 The minimum quorum of the SQN RARC necessary for the performance of the SQN RARC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and 4 members (including alternates) as long as one is a plant representative. R62

Responsibilities

6.5.3.6 The SQN RARC shall be responsible for:

a. Review of changes to the OFFSITE DOSE CALCULATION MANUAL.

b. Review of procedures required by Specification 6.8.4 and changes thereto.

c. Review for information purposes of the results of any audits, reviews, or evaluations of the Quality Assurance Program for effluent and environmental monitoring and radiological assessments involving dose evaluations and projections.

d. Review of proposed changes to the Technical Specifications related to radiological assessments involving dose calculations and projections and environmental radiological monitoring.

Authority

6.5.3.7 The SQN RARC shall:

a. Recommend in writing to the Corporate Manager of Radiological Control and the Plant Manager, approval or disapproval of items considered under 6.5.3.6 above. R15

b. Render determinations in writing with regard to whether or not each item considered under 6.5.3.6 constitutes an unreviewed safety ~~question~~.

~~c. Provide written notification within 24 hours to the Senior Vice President, Nuclear Power and the Nuclear Safety Review Board of disagreement between the SQN RARC and the Corporate Manager of Radiological Control; however, the Corporate Manager of Radiological Control shall have responsibility for resolution of such disagreement pursuant to 6.1.2 above.~~ R73 R1

~~Records~~

~~6.5.3.8 The SQN RARC shall maintain written minutes of each SQN RARC meeting that at a minimum, document the results of all SQN RARC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Senior Vice President, Nuclear Power; PORC; and the Nuclear Safety Review Board.~~ R62 R78

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and R40

b. Each REPORTABLE EVENT shall be reviewed by the PORC and the results of this review shall be submitted to the NSRB and the Site Vice President. R1

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The unit shall be placed in at least HOT STANDBY within one hour.

b. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within one hour. The Site Vice President and the NSRB shall be notified within 24 hours. R1

c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.

d. The Safety Limit Violation Report shall be submitted to the Commission, the NSRB and the Site Vice President within 14 days of the violation. R1

6.8 PROCEDURES & PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Plant Physical Security Plan implementation.

e. Site Radiological Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. Quality Assurance Program for effluent AND ENVIRONMENTAL monitoring, using the guidance contained in Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975. R46

i. OFFSITE DOSE CALCULATION MANUAL IMPLEMENTATION.

6.8.2 ~~Each procedure of 6.8.1 above, and changes thereto, shall be reviewed~~ and approved prior to implementation as set forth in Specification 6.5.1A above. R62

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is approved in accordance with Specification 6.5.1A above within 14 days of implementation. R62

~~6.8.4 Written procedures shall be established, implemented and maintained by Radiological Control covering the activities below:~~ R62

~~a. OFFSITE DOSE CALCULATIONAL MANUAL implementation.~~

~~b. Quality Assurance Program for environmental monitoring, using the guidance contained in Regulatory Guide 4.15, December 1977.~~ R46

6.8.~~4~~5 The following programs shall be established, implemented, maintained, and changes thereto made in accordance with Section 6.5.1A: R15 R62

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The

systems include the safety injection system, residual heat removal system, chemical and volume control system, containment spray system, and RCS sampling system. The program shall include the following: R78

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentrations in vital areas under accident conditions. This program shall include the following:

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

(i) Identification of a sampling schedule for the critical variables and control points for these variables,

(ii) Identification of the procedures used to measure the values of the critical variables,

(iii) Identification of process sampling points, WHICH SHALL INCLUDE

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for off-control point chemistry conditions,

(vi) Procedures identifying (a) the authority responsible for the interpretation of the data; and (b) the sequence and timing of administrative events required to initiate corrective action, and

~~(vii)~~ Monitoring ~~of the condensate~~ at the discharge of the condensate pumps for evidence of condenser in-leakage, ~~when condenser in-leakage is confirmed, the leak shall be repaired, plugged, or isolated within 96 hours~~.

Diesel Generator Reliability Improvement Program (Continued)

A supplemental report shall be prepared within 30 days after each subsequent failure during a valid demand for so long as the affected diesel generator unit continues to violate the criteria (3/20 or 6/100) for the reliability improvement program remedial action. The supplemental report need only update the failure/demand history for the affected diesel generator unit since the last report for that diesel generator. The supplemental report shall also present an analysis of the failure(s) with a root cause determination, if possible, and shall delineate any further procedural, hardware or operational changes to be incorporated into the diesel generator improvement program and the schedule for implementation of those changes.

In addition to the above, submit a yearly data report on the diesel generator reliability.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated. R56

6.10.1 The following records shall be retained for at least five years:

a. Records and logs of unit operation covering time interval at each power level.

b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

c. All REPORTABLE EVENTS submitted to the Commission.

d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

e. Records of changes made to the procedures required by Specification 6.8.1 ~~and 6.8.4~~.

f. Records of radioactive shipments.

g. Records of sealed source and fission detector leak tests and results.

h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

d. Records of gaseous and liquid radioactive material released to the environs. ← IMPACTED BY TS CHANGE 93-06

e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the facility staff.

h. Records of in-service inspections performed pursuant to these Technical Specifications. R78

i. Records of Quality Assurance activities required for lifetime retention by the Nuclear Quality Assurance Plan. R167

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the PORC, ~~SQN RARC~~, and the NSRB. R62

l. Records of analyses required by the radiological environmental monitoring program.

m. Records of secondary water sampling and water quality.

n. Records of the service life monitoring of all safety-related hydraulic and mechanical snubbers, required by T/S 3.7.9, including the maintenance performed to renew the service life.

o. Records for Environmental Qualification which are covered under the provisions of Paragraph 2.c.(12)(b) of License No. DPR-77. R62

p. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM. R152

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

IMPACTED BY TS CHANGE 93-06

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Special (Radiation) Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

IMPACTED BY TS CHANGE 93-06

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Site Radiological Control Manager in the Special (Radiation) Work Permit. R156

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Site Radiological Control Manager. R156

OPERATIONS

R152

*Radiological Control personnel or personnel escorted by Radiological Control personnel in accordance with approved emergency procedures, shall be exempt from the SWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas. R62

IMPACTED BY TS CHANGE 93-06

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: R152

   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.

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: R152

   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~~ PORC AND THE PROCESS IN SPECIFICATION 6.5.1A.

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 Annual 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. R173 R152

IMPACTED BY TS CHANGE 93-06

(13) Fire Protection System (Section 9.5)

a. TVA shall maintain in effect and fully implement all provisions of the approved fire protection plan and the NRC staff's Fire Protection Review in the Sequoyah Safety Evaluation Report and Supplements.

b. TVA shall replace the control room ceiling panels with panels acceptable to NRC by September 30, 1981.

c. TVA shall comply with Section III.G, III.J, III.L and III.O of Appendix R of 10 CFR 50, except where NRC has approved deviations, on a schedule consistent with that required for other operating reactors. By October 1, 1981, TVA shall submit a report that identifies and justifies differences between existing or proposed fire protection features and those features specified in Section III.G, III.J, III.L and III.O of Appendix R to 10 CFR Part 50. R2

(14) Compliance With Regulatory Guide 1.97

TVA shall implement modifications necessary to comply with Revision 2 of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," dated December 1980 by startup from the Unit 2 Cycle 4 refueling outage. R45

(15) Corrosion of Carbon Steel Piping

TVA shall carry out a surveillance program on corrosion of carbon steel piping in accordance with TVA document SQRD-50-328/81-10 dated August 25, 1981, and procedures for implementation are to be submitted for NRC concurrence by October 15, 1981.

(16) NUREG-0737 Conditions (Section 22.2)

Each of the following conditions shall also be performed to the satisfaction of the NRC:

a. Shift Technical Advisor (Section 22.2, I.A.1.1)

TVA shall provide a fully-trained on-shift technical advisor to the shift supervisor. OPERATIONS

b. Independent Safety Engineering Group (Section 22.2, I.B.1.2)

TVA shall have an onsite Independent Safety Engineering Group.

SECTION PAGE

IDENTIFIED LEAKAGE

1.16 IDENTIFIED LEAKAGE shall be: R146

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.

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 a 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. R146 R63

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 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.8. R146 R134 R159

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). R146

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence. R50

~~6.1.2 The Corporate Manager of Radiological Control shall be responsible for implementing the radiological environmental program and dose calculations and projections as described in the Offsite Dose Calculation Manual (ODCM).~~ R142

6.1.~~2~~2 The Shift Supervisor (OPERATIONS) (or during his absence from the Control Room, a designated individual) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Site Vice President shall be reissued to all station personnel on an annual basis. R50 R142

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

An onsite and an offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR and will be updated in accordance with 10 CFR 50.71(e).

b. The Senior Vice President, Nuclear ~~Group~~ (POWER) shall have corporate responsibility for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured. R66

c. The Plant Manager shall be responsible for overall unit safe operation, and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 FACILITY STAFF

a. Each on duty unit shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.

b. At least one licensed Reactor Operator shall be in the unit Control Room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the Control Room.

c. A Radiological Control technician# shall be onsite when fuel is in the reactor. R50

d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

e. A Fire Brigade of at least 5 members shall be maintained onsite at all times#. The Fire Brigade shall not include the Shift Supervisor and the 2 other members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.

OPERATIONS

f. The Operations Superintendent shall hold a Senior Reactor Operator license. R1

g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (i.e., senior reactor operators, reactor operators, assistant unit operators, Radiological Control, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintanance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time. R142
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

REPLACE WITH INSERT A

~~Any deviation from the above guidelines shall be authorized by the Plant Manager (or Duty Plant Manager), or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.~~ R Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

The Radiological Control technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions. R50

DEC 1 6 1991

INSERT A

Any deviation from the above guidelines shall be authorized in advance by the Plant Manager or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

WITH UNIT 1 IN MODE 5 OR 6 OR DE-FUELED

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODES 1, 2, 3 & 4	MODES 5 & 6
SOS ~~SS~~	1[a]	1[a]
SRO	1	None
RO	2	1
AO	2	2[b]
STA	1	None

WITH UNIT 1 IN MODES 1, 2, 3 OR 4

POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODES 1, 2, 3 & 4	MODES 5 & 6
SOS ~~SS~~	1[a]	1[a]
SRO	1[a]	None
RO	2[b]	1
AO	2[b]	1
STA	1[a]	None

a/ Individual may fill the same position on Unit 1.

b/ One of the two required individuals may fill the same position on Unit 1.

TABLE 6.2-1 (Continued)

TABLE NOTATION

SOS
SS - Shift Supervisor with a Senior Reactor Operators License on Unit 2 (OPERATIONS)
SRO - Individual with a Senior Reactor Operators License on Unit 2
RO - Individual with a Reactor Operators License on Unit 2
AO - Auxiliary Operator
STA - Shift Technical Advisor

Except for the Shift Supervisor (OPERATIONS), the Shift Crew Composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the Shift Crew Composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

During any absence of the Shift Supervisor (OPERATIONS) from the Control Room while the unit is in MODES 1, 2, 3 or 4, an individual (other than the Shift Technical Advisor) with a valid SRO license shall be designated to assume the Control Room command function. During an absence of the Shift Supervisor from the Control Room while the unit is in MODE 5 or 6, an individual with a valid SRO or RO license (other than the Shift Technical Advisor) shall be designated to assume the Control Room command function. (OPERATIONS)

6.2.3 INDEPENDENT SAFETY ENGINEERING (ISE)

FUNCTION

6.2.3.1 The ISE shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety.

COMPOSITION

6.2.3.2 The ISE shall be composed of at least 3 dedicated full-time engineers located onsite. These engineers will be supplemented as necessary by full-time engineers shared among all TVA nuclear sites to achieve an equivalent staffing of 5 full-time engineers performing the ISE functions applicable to Sequoyah. R108

RESPONSIBILITIES

6.2.3.3 The ISE shall be responsible for maintaining surveillance of plant activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

AUTHORITY

6.2.3.4 The ISE shall make detailed recommendations for revised procedures, equipment modifications, or other means of improving plant safety to the Manager, Nuclear Experience Review/Independent Safety Engineering. R153

6.2.4 SHIFT TECHNICAL ADVISOR (STA)

6.2.4.1 The STA shall serve in an advisory capacity to the OPERATIONS Shift Supervisor on matters pertaining to the engineering aspects of assuring safe operation of the unit. R142 R66

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the Site Radiological Control Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. R153

*Not responsible for sign-off function.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Plant Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55 and shall include familiarization with relevant industry operational experience. R153 R50

6.5 REVIEW AND AUDIT

6.5.0 Senior Vice President, Nuclear Power is responsible for the safe operation of all TVA power plants. R66

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety. R50

COMPOSITION

6.5.1.2 The PORC shall be composed of the:

Chairman:	Plant Manager
Member:	Operations Manager AND CHEMISTRY
Member:	~~Site~~ Radiological ~~Control~~ Manager
Member:	Maintenance Manager
Member:	Technical Support Manager
Member:	Quality Audit and ~~Monitoring~~ ASSESSMENT Manager
Member:	~~Nuclear~~ SITE Engineering Representative

R142 R153

i. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Site Vice President and to the Nuclear Safety Review Board. R50 R142

j. Review of All Proposed Changes To The OFFSITE DOSE CALCULATION MANUAL.

AUTHORITY

6.5.1.7 The PORC shall:

a. Recommend in writing to the Plant Manager approval or disapproval of items considered under 6.5.1.6(a), (b) and (c) above. R50

b. Require a determination in writing with regard to whether or not each item considered under 6.5.1.6(b), (c), and (e) above constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the Site Vice President and the Nuclear Safety Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above. R142

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Site Vice President and the Nuclear Safety Review Board. R50 R142

6.5.1A TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.1A.1. Activities which affect nuclear safety shall be conducted as follows: R50

a. Procedures required by Specification 6.8.1 and other procedures which affect plant nuclear safety, and changes thereto, shall be prepared, reviewed and approved. Each such procedure or procedure change shall be reviewed by a qualified individual other than the individual who prepared the procedure or procedure change, but who may be from the same organization as the individual who prepared the procedure or procedure change. Procedures shall be approved by the appropriate responsible manager as designated in writing by the Plant Manager. The Plant Manager, or Duty Plant Manager shall approve designated Administrative Procedures. R66 R142

b. Proposed changes or modifications to structures, systems, and components that affect plant nuclear safety shall be reviewed by a qualified individual/group other than the individual/group which designed the modification, but who may be from the same organization R142

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSRB Chairman to provide expert advice to the NSRB.

MEETING FREQUENCY

6.5.2.5 The NSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 The minimum quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these technical specifications shall consist of more than half the NSRB membership or at least 5 members, whichever is greater. This quorum shall include the Chairman or his appointed alternate and the NSRB members, including appointed alternate members, meeting the requirements of Specification 6.5.2.3. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The NSRB shall be cognizant of review of: R50

a. The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.

b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.

c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.

d. Proposed changes to Technical Specifications or this Operating License.

e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.

f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.

g. All REPORTABLE EVENTS. R50

h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.

i. Reports and meetings minutes of the PORC, ~~and the SQN RARC.~~ R50

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.

b. The performance, training and qualifications of the entire facility staff at least once per 12 months. R66

c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per 6 months.

d. The performance of activities required by the ~~Operational~~ NUCLEAR Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.

e. The Site Radiological Emergency Plan and implementing procedures at least once per 12 months.

f. The Plant Physical Security Plan, the Safeguards Contingency Plan, and implementing procedures at least once per 12 months.

g. Any other area of unit operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power. R66

h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.

i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.

j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

k. The radiological environmental monitoring program and the results thereof at least once per 12 months.

l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

m. The PROCESS CONTROL PROGRAM and implementing procedures for SOLIDIFICATION of radioactive wastes at least once per 24 months.

n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975, at least once per 12 months. R34

AUTHORITY

6.5.2.9 The NSRB shall report to and advise the Senior Vice President, Nuclear Power on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8. R66

RECORDS

6.5.2.10 Records of NSRB activities shall be prepared, approved and distributed as indicated below:

a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following each meeting.

b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following completion of the review. R66

c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power and to the management positions responsible for the areas audited within 30 days after ~~completion of the audit~~

THIS SPECIFICATION IS DELETED

6.5.3 ~~RADIOLOGICAL ASSESSMENT REVIEW COMMITTEE (RARC)~~

~~Function~~

6.5.3.1 The SQN RARC shall function to advise the Corporate Manager of Radiological Control and the Plant Manager on all matters related to radiological assessments involving dose calculations and projections and environmental monitoring. R14

~~Composition~~

6.5.3.2 The SQN RARC shall be composed of the:

~~Chairman: Technical Assistance Section Supervisor~~
~~Member: Health Physicist, Gaseous, Radiological Control~~
~~Member: Health Physicist, Liquid, Radiological Control~~
~~Member: Meteorologist, Air Quality Branch~~
~~Member: Chemical Engineer, Chemistry Section, SQN~~
~~Member: Health Physicist, Environmental Monitoring, Radiological Control~~

~~Alternates~~

~~6.5.3.3 All alternate members shall be appointed in writing by the SQN RARC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SQN RARC activities at any one time.~~ R50

~~Meeting Frequency~~

~~6.5.3.4 The SQN RARC shall meet at least once per six months or as requested by the SQN RARC Chairman, his designated alternate, or a plant representative.~~

AUG

Quorum

6.5.3.5 The minimum quorum of the SQN RARC necessary for the performance of the SQN RARC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and 4 members (including alternates) as long as one is a plant representative.

Responsibilities

6.5.3.6 The SQN RARC shall be responsible for:

a. Review of changes to the OFFSITE DOSE CALCULATION MANUAL.

b. Review of procedures required by Specification 6.8.4 and changes thereto.

c. Review for information purposes of the results of any audits, reviews, or evaluations of the Quality Assurance Program for effluent and environmental monitoring and radiological assessments involving dose evaluations and projections. R50

d. Review of proposed changes to the Technical Specifications related to radiological assessments involving dose calculations and projections and environmental radiological monitoring.

Authority

6.5.3.7 The SQN RARC shall:

a. Recommend in writing to the Corporate Manager of Radiological Control and the Plant Manager, approval or disapproval of items considered under 6.5.3.6 above. R142

b. Render determinations in writing with regard to whether or not each item considered under 6.5.3.6 constitutes an unreviewed safety question.

c. Provide written notification within 24 hours to the Senior Vice President, Nuclear Power and the Nuclear Safety Review Board of disagreement between the SQN RARC and the Corporate Manager of Radiological Control; however, the Corporate Manager of Radiological Control shall have responsibility for resolution of such disagreement pursuant to 6.1.2 above. R66 R142

Records

6.5.3.8 The SQN RARC shall maintain written minutes of each SQN RARC meeting that at a minimum, document the results of all SQN RARC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Senior Vice President, Nuclear Power; ~~the SQN RARC; and the Nuclear Safety Review Board.~~ R66

h. Quality Assurance Program for effluent and environmental monitoring, using the guidance contained in Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975. R34

i. OFFSITE DOSE CALCULATION MANUAL Implementation.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed and approved prior to implementation as set forth in Specification 6.5.1A above. R50

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is approved in accordance with Specification 6.5.1A above within 14 days of implementation. R50

~~6.8.4 Written procedures shall be established, implemented and maintained by Radiological Control covering the activities below:~~ R50

~~a. OFFSITE DOSE CALCULATIONAL MANUAL implementation.~~

~~b. Quality Assurance Program and environmental monitoring, using the guidance contained in Regulatory Guide 4.15, December 1977.~~ R34

R134

6.8.4 The following programs shall be established, implemented, maintained, and changes thereto made in accordance with Section 6.5.1A: R50

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the safety injection system, residual heat removal system, chemical and volume control system, containment spray system, and RCS sampling system. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentrations in vital areas under accident conditions. This program shall include the following:

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

(i) Identification of a sampling schedule for the critical variables and control points for these variables,

(ii) Identification of the procedures used to measure the values of the critical variables,

(iii) Identification of process sampling points, WHICH SHALL INCLUDE

(iv) Procedures for the recording and management of data,

(v) Procedures defining corrective actions for off-control point chemistry conditions,

(vi) Procedures identifying (a) the authority responsible for the interpretation of the data; and (b) the sequence and timing of administrative events required to initiate corrective action, and

~~(vii)~~ Monitoring ~~of the condensate at~~ the discharge of the condensate pumps for evidence of condenser in-leakage. ~~When condenser in-leakage is confirmed, the leak shall be repaired, plugged, or isolated.~~

d. Deleted

R149

Diesel Generator Reliability Improvement Program (Continued)

A supplemental report shall be prepared within 30 days after each subsequent failure during a valid demand for so long as the affected diesel generator unit continues to violate the criteria (3/20 or 6/100) for the reliability improvement program remedial action. The supplemental report need only update the failure/demand history for the affected diesel generator unit since the last report for that diesel generator. The supplemental report shall also present an analysis of the failure(s) with a root cause determination, if possible, and shall delineate any further procedural, hardware or operational changes to be incorporated into the diesel generator improvement program and the schedule for implementation of those changes.

In addition to the above, submit a yearly data report on the diesel generator reliability. R44

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.1 The following records shall be retained for at least five years:

a. Records and logs of unit operation covering time interval at each power level.

b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

c. All REPORTABLE EVENTS submitted to the Commission.

d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

e. Records of changes made to the procedures required by Specification 6.8.1 ~~and 6.8.4~~.

f. Records of radioactive shipments.

g. Records of sealed source and fission detector leak tests and results.

h. Records of annual physical inventory of all sealed source material of record.

6.10.2 The following records shall be retained for the duration of the Unit Operating License: | R28

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

d. Records of gaseous and liquid radioactive material released to the environs. ← IMPACTED BY TS CHANGE 93-06

e. Records of transient or operational cycles for those unit components identified in Table 5.7-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the facility staff.

h. Records of in-service inspections performed pursuant to these Technical Specifications.

i. Records of Quality Assurance activities required for lifetime retention by the Nuclear Quality Assurance Plan. | R50 | R15

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of meetings of the PORC, ~~SQN RARC~~, and the NSRB. | R50

l. Records of analyses required by the radiological environmental monitoring program.

m. Records of secondary water sampling and water quality.

n. Records of the service life monitoring of all safety-related hydraulic and mechanical snubbers, required by T/S 3.7.9, including the maintenance performed to renew the service life.

o. Records for environmental qualification which are covered under the provisions of paragraph 2.C.(10)(b) of license No. DPR-79. | R50

p. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM. | R134

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

IMPACTED BY TS CHANGE 93-06

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c) (2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Special (Radiation) Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

IMPACTED BY TS CHANGE 93-06

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Site Radiological Control Manager in the Special (Radiation) Work Permit. R142

6.12.2 The requirements of 6.12.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Site Radiological Control Manager. OPERATIONS R142

*Radiological Control personnel or personnel escorted by Radiological Control personnel in accordance with approved emergency procedures, shall be exempt from the SWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas. R50

IMPACTED BY TS CHANGE 93-06

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: R134

   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.

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: R134

   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 ~~PARC~~ PORC THE PROCESS IN SPECIFICATION 6.5.1A AND

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 Annual 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. R159 R134

IMPACTED BY TS CHANGE 93-06

ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-93-16)

DESCRIPTION AND JUSTIFICATION FOR

REVISION OF ADMINISTRATIVE CONTROLS

Description of Change

TVA proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 technical specifications (TSs) to revise various administrative controls found in Section 6.0 and the operating license. The following is a summary of these changes:

1. Implementation of the Offsite Dose Calculation Manual (ODCM) is no longer controlled by the Corporate Manager of Radiological Control and the Radiological Assessment Review Committee (RARC).

   a. Deleted Section 6.1.2 and renumbered Section 6.1.3
   b. Added Item j to Section 6.5.1.6 to require Plant Operations Review Committee (PORC) review of proposed changes to the ODCM
   c. Added Item i to Section 6.8.1 to include the ODCM implementation
   d. Deleted Section 6.8.4.a requiring Radiological Control to implement and maintain the ODCM and renumbered Section 6.8.5
   e. Section 6.14.1.2 has been revised to replace "SQN RARC" with the process in Specification 6.5.1A and the SQN PORC
   f. ODCM definition in Section 1.18 revised to reference Section 6.8.4
   g. Deleted reference to Section 6.8.4 for record retention in Section 6.10.1.e

2. The approval authority for deviations from the overtime guidelines in Section 6.2.2.g has been revised to include Plant Manager designees as specified in the approved administrative procedures.

3. The titles for PORC members have been revised to agree with the current organizational structure as follows:

   a. Site Radiological Control Manager has been changed to Radiological and Chemistry Manager.
   b. Quality Audit and Monitoring Manager has been changed to Quality Audit and Assessment Manager.
   c. Nuclear Engineering Representative has been changed to Site Engineering Representative.

4. The requirement for the RARC is deleted from TSs.

   a. Section 6.5.2.7.i has been revised to delete "and the SQN RARC."
   b. Section 6.5.3 has been deleted in its entirety.
   c. Section 6.10.2.k has been revised to delete "SQN RARC."
   d. The index has been revised to reflect the deletion of Section 6.5.3.

5. The condenser in-leakage monitoring requirement in Section 6.8.5.c.(ii) has been moved to Section 6.8.5.c.(iii); and the requirement to repair, plug, or isolate leaks has been deleted.

6. The Operations organization title of "Shift Supervisor" (SS) has been revised throughout Section 6.0 to be "Shift Operations Supervisor" (SOS). This change also applies to Item 2.C.(23).A and 2.C.(16).a of the operating license for Unit 1 and Unit 2, respectively.

7. The title for the Senior Vice President, Nuclear Group, in Section 6.2.1.b has been revised to read Senior Vice President, Nuclear Power.

8. The program title of "Operational Quality Assurance Program" in Section 6.5.2.8.d has been revised to read Nuclear Quality Assurance Program.

9. The requirement to implement a Quality Assurance Program for environmental monitoring has been deleted in Section 6.8.4.b and is relocated to Section 6.8.1.h.

Reason for Change

The following discussions provide the reasons for the items described above:

1. Control of the SQN ODCM by the Corporate Manager of Radiological Control and the RARC was established by SQN TS Amendments 58 and 50 for Units 1 and 2, respectively. The RARC was originally created to review and approve all matters relating to the SQN ODCM because the TVA organizational structure was such that the development and maintenance of dose calculation methodologies and the design and operation of the Radiological Environmental Monitoring Program were performed by an offsite organization that was not within TVA's Nuclear Power organization. The SQN RARC was designed to allow this offsite organization and the plant to have representatives on the committee, which reviewed and approved all changes to the ODCM, all TS changes relating to ODCM issues, procedures that implement the ODCM, and the results of any quality assurance audits of the ODCM implementing programs. Since the time of the TS amendments described above, the organizational structure has changed; and all responsibility for the contents of the ODCM now resides within the TVA Nuclear Power organization. Because of this, it is no longer necessary to formally assign responsibility for these program areas to offsite support organizations. This change assigns all responsibility for ODCM implementing procedures to the plant, and the review and approval of ODCM changes to the SQN PORC and the independent qualified reviewer process.

2. This change is proposed to enhance compliance with the TS requirement to obtain prior approval for overtime deviations. This change will allow the Plant Manager to designate the appropriate individuals within administrative procedures to perform the review and approval for overtime deviations. This will enhance the ability to comply with the TS requirement on backshifts, weekends, and holiday periods.

3. The PORC membership title changes are proposed to provide consistency with the current SQN organizational titles. This change does not alter the position responsibilities and only serves to update the position titles.

4. The decision to delete the RARC from the TSs is the result of the present TVA organization. The charter for the RARC to implement the ODCM is no longer required as described above in Item 1. Therefore, maintaining TS requirements for the RARC is not necessary because the review and approval of the ODCM and Environmental Monitoring Program are covered by TS requirements for the PORC and independent qualified reviewer.

5. The present requirements for the repair of condenser in-leakage were part of the initial version of the SQN TSs issued for unit startup. The basis for including repair requirements in TSs appears to be based on regulatory guidance found in Branch Technical Position MTEB 5-3 and the Standard Review Plan, NUREG 0800. SQN presently uses administrative procedures that implement action levels and timeframes for the repair of condenser in-leakage. These procedures incorporate industry guidance that is consistent with the Electric Power Research Institute (EPRI) recommendations for secondary water chemistry. These administrative controls provide better control of secondary water chemistry and eliminate the need to maintain the repair requirements presently found in TSs. The TS requirement to monitor condenser in-leakage has not been deleted but is relocated with Section 6.8.5.c.

6. The present TVA organization has implemented the title of SOS for the individual that is responsible for control room command. The TS presently refers to this position as the SS. The TS title change from SS to SOS will allow TSs to be consistent with the TVA organizational titles and the Updated Final Safety Analysis Report (UFSAR).

7. Previous revisions to TS Section 6.0 updated the title of Senior Vice President, Nuclear Group, to Senior Vice President, Nuclear Power. However, this title in Section 6.2.1.b was inadvertently overlooked and is now being revised to provide consistency with Section 6.0 discussions and the current TVA organizational structure.

8. The title change to the Nuclear Quality Assurance Program is proposed to provide consistency with the TVA Nuclear Quality Assurance Manual. This change reflects the current TVA title for this program.

9. The relocation of the Quality Assurance Program procedures for environmental monitoring in Section 6.8 of the TSs reflects the present TVA provisions to meet this requirement. These procedures are presently implemented by organizations within the TVA Nuclear Power organization and can be controlled in the same manner as other SQN procedures. These procedures no longer require specific Radiological Control responsibility because the coordination with organizations outside of Nuclear Power is not required for the implementation of the Quality Assurance Program procedures on environmental monitoring.

Justification for Change

The justification for each item described above is provided as follows:

1. The proposed change will control the review, approval, and implementation of the ODCM at the same level as other activities such as surveillance testing and the Radiological Emergency Plan. The existing responsibilities by the Corporate Manager of Radiological Control and the RARC are no longer necessary because all the organizations involved in the ODCM implementation are within the Nuclear Power structure. Changes to the ODCM will continue to receive adequate review and approval through the independent qualified reviewer and the PORC requirements proposed in this change. Therefore, the proposed change provides the appropriate administrative control for the implementation of the ODCM and will continue to ensure that the offsite dose calculations are adequately controlled. This level of review and approval is consistent with standard TSs (NUREG 1431).

2. The proposed change allows the Plant Manager to designate the appropriate individuals to review and approve overtime deviations before exceeding guideline limits. These designations will enhance the ability to approve overtime deviations within the appropriate timeframes. The Plant Manager will continue to have control of overtime usage through the monthly reviews of individual overtime and the designation of approval authorities. This flexibility for designating the approval authority for overtime deviations is consistent with NUREG 1431 and will continue to maintain overtime usage at acceptable levels to support nuclear safety.

3. The proposed title changes for PORC members will continue to maintain the PORC as a highly diversified and knowledgeable committee to advise the Plant Manager. These title changes do not affect position responsibilities and only provide consistency with the current organizational positions. There is no decrease in nuclear safety associated with the proposed change.

4. The need to control RARC activities by the TS requirements is no longer necessary. The proposed changes remove the existing RARC responsibilities for reviewing and approving the ODCM, including the Environmental Monitoring Program as discussed in Item 1. The TS requirements for review and approval will be controlled by the independent qualified reviewer process and the PORC. This change will continue to ensure adequate controls for implementation of the ODCM and Environmental Monitoring Program without specific TS requirements for the RARC and without a decrease in nuclear safety for offsite dose considerations.

5. The proposed change does not alter the monitoring requirements for condenser in-leakage, but does relocate it within Item (iii) of Specification 6.8.5.c. The TS requirement to repair the leak has been deleted and will be controlled by SQN administrative procedures for the Secondary Water Chemistry Program. Site administrative

procedures incorporate the applicable practices and identify chemistry parameters, their values, and the required monitoring frequency found in the EPRI guidelines. In accordance with the industry guidelines, SQN has a stepped approach to the corrective actions of a secondary side chemistry variance. These corrective actions are briefly as follows:

Action Level I - Implement corrective actions to return the parameters to below Action Level I values.
Action Level II - Immediately start reducing the power level to 30 percent and achieve that power level within 8 hours.
Action Level III - Shut down the plant as quickly as safe plant operation permits to Mode 3 or lower as necessary to satisfy chemistry conditions.

Based on industry standards, SQN procedures incorporate the required actions that are based on the chemistry parameters that cause steam generator (S/G) degradation. The effects of condenser tube in-leakage (especially small leaks) can be controlled by additives to secondary chemistry and enable the plant to plug a condenser tube at a convenient time (i.e., during a weekend) without adversely affecting the chemistry parameters, which are the greatest cause of S/G degradation. Additionally, numerous other corrective action guidelines are provided to ensure that adequate and effective measures are taken to correct a secondary chemistry variance. The proposed changes are consistent with the NUREG 1431 recommendations for a Secondary Water Chemistry Program. These changes will continue to support the Secondary Water Chemistry Program to maintain nuclear safety.

6. Through organizational changes, the title for the position presently referred to as SS was updated to SOS. This change is solely an administrative title change with no changes in duties or responsibilities. This title change will not impact nuclear safety and provides consistency with the TVA organization titles and UFSAR descriptions.

7. Through organizational changes, the title for the position presently referred to as Senior Vice President, Nuclear Group, in Section 6.2.1.b was updated to Senior Vice President, Nuclear Power. This change is solely an administrative title change with no changes in duties or responsibilities. This title change will not impact nuclear safety and provides consistency with the TVA organization titles and UFSAR descriptions.

8. The TVA title for the Nuclear Power Quality Assurance Program has been revised to the "Nuclear Quality Assurance Program." This change only updates the title and does not affect the attributes associated with the program. This change will not impact nuclear safety and provides consistency with the TVA Nuclear Quality Assurance Manual.

9. The change to relocate the TS requirement for procedures covering the Environmental Monitoring Quality Assurance Program does not alter the requirement. All aspects of this requirement are retained with only the specific responsibility for establishing, implementing, and maintaining the procedures being removed from the Radiological Control organization. These procedures will be controlled the same as the procedures for other similar activities with the use of the independent qualified reviewer process. This review process for changes to these procedures is acceptable because the involvement by organizations outside of TVA Nuclear Power does not need to be coordinated through Radiological Control. The independent qualified reviewer process utilizes the necessary reviews to implement procedure changes without this special coordination. The procedural requirements will continue to be adequately controlled to ensure the quality assurance attributes and maintain plant nuclear safety.

The changes described and explained in the above discussions are administrative in nature and do not result in any changes to plant equipment, design, setpoints, or operating practices. The administrative controls implemented by the proposed changes continue to provide the adequate requirements to ensure plant nuclear safety. Therefore, these changes are considered acceptable as explained above.

Environmental Impact Evaluation

The proposed change request does not involve an unreviewed environmental question because the 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 the staff'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-93-16)

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). The 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 proposed changes only affect the administrative controls found in Section 6.0 of the SQN TSs and the operating license. No plant equipment or operating practices are affected by these changes. The revised administrative controls will continue to adequately implement administrative activities to support plant nuclear safety. Since there are no physical changes to the plant, there is no increase in the probability of an accident because these administrative controls are not the source of previously evaluated accidents. Similarly, with no change to plant equipment or operating requirements, the plant response to accident conditions and therefore the consequences of an accident remain unchanged. These proposed changes will not increase the consequences of an accident and offsite dose rates will not be impacted.

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

   The administrative controls affected by the proposed changes are not considered to be the source of any accident and these changes will not alter any plant features or processes. Therefore, the proposed changes will not create the possibility of a new or different kind of accident and the administrative controls will continue to implement the actions necessary to support plant activities and nuclear safety.

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

   Plant features and setpoints remain unchanged by the proposed changes to the administrative controls. The margins of safety established by the SQN design are not affected by these changes. The proposed administrative controls will continue to maintain the actions and programs that ensure appropriate plant design, operation, and procedures to support the required margin of safety. Therefore, the proposed changes will not reduce the margin of safety.