ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATIONS FOR

SEQUOYAH NUCLEAR PLANT UNITS 1 AND 2

SURVEILLANCE REQUIREMENTS (Continued)

c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the Regulatory Guide 1.52, Revision 2, March 1978.

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches Water Gauge while operating the filter train at a flow rate of 4000 cfm ± 10%.

2. Verifying that the filter train starts on a Phase A containment isolation Test Signal.

3. Verify the operation of the filter cooling bypass valves.

4. Verifying that the heaters dissipate 16 ± 1.6 kw when tested in accordance with ANSI N510-1975.

5. Verifying that each subsystem produces from atmospheric pressure a pressure in the annulus equal to or more negative than minus 0.5 inches water gage relative to the outside atmosphere within one minute.

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm ± 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm ± 10%.

SURVEILLANCE REQUIREMENTS (Continued)

c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the Regulatory Guide 1.52, Revision 2, March 1978.

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches Water Gauge while operating the filter train at a flow rate of 4000 cfm ± 10%.

2. Verifying that the filter train starts on a Phase A containment isolation Test Signal.

3. Verify the operation of the filter cooling bypass valves.

4. Verifying that the heaters dissipate 16 ± 1.6 kw when tested in accordance with ANSI N510-1975.

5. Verifying that each subsystem produces from atmospheric pressure a pressure in the annulus equal to or more negative than minus 0.5 inches water gage relative to the outside atmosphere within one min

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm ± 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm ± 10%.

ENCLOSURE 2

SEQUOYAH NUCLEAR PLANT
JUSTIFICATION FOR PROPOSED TECHNICAL SPECIFICTION

The present limit of 125 cfm in annulus inleakage cannot be met. Extensive testing has been conducted during the last two weeks with no success in reducing the inleakage below 160 cfm. The present Sequoyah technical specification is more restrictive than the current revision of Westinghouse Standard Technical Specification (STS) issued by NRC. TVA proposes to adopt the presently accepted industry standard test as listed in the Westinghouse STS. Once per 18 months each Emergency Gas Treatment System cleanup subsystem will be tested to demonstrate that it can produce a pressure in the annulus equal to or more negative than minus 0.5 inches of water relative to the outside atmosphere within one minute when started at atmospheric conditions. TVA will ensure that operation in this mode, with this change, will have an insignificant impact on offsite dose levels.