

ENCLOSURE 1
PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE
SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2
DOCKET NOS. 50-327 AND 50-328
(TVA-SQN-TS-94-08)

LIST OF AFFECTED PAGES

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3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 Primary CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

Without primary CONTAINMENT INTEGRITY, restore CONTAINMENT INTEGRITY within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 Primary CONTAINMENT INTEGRITY shall be demonstrated:

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except as provided in Table 3.6-2 of Specification 3.6.3. R16
- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3. R134
- c. Perform required visual examinations and leakage rate testing at P_a in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions. The maximum allowable leakage rate, L_a , is 0.25% of containment air weight per day at the calculated peak containment pressure P_a , 12 psig. R180

or the main steam valve vaults

*Except valves, blind flanges, and deactivated automatic valves which are located inside the annulus or containment and are locked, sealed or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except that such verification need not be performed more often than once per 92 days.

3/4.6 CONTAINMENT SYSTEMS

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- b. By verifying that each containment air lock is in compliance with the requirements of Specification 3.6.1.3.
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R117

R167

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ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

(TVA-SQN-TS-94-08)

DESCRIPTION AND JUSTIFICATION FOR

REVISION OF SPECIFICATION 4.6.1.1 FOOTNOTE

TO ADD MAIN STEAM VALVE VAULTS TO THE

EXCLUSION AREA - UNITS 1 AND 2

Description of Change

TVA proposes to modify the Sequoyah Nuclear Plant (SQN) Units 1 and 2 technical specifications (TSs) to revise Surveillance Requirement (SR) 4.6.1.1 to add the main steam valve vaults to the footnote. This would allow the valves, blind flanges, and deactivated automatic valves inside the valve vaults that are required to be in the closed position during accident conditions and that are locked, sealed, or otherwise secured in the closed position to only require inspection during cold shutdown rather than once every 31 days.

Reason for Change

Components within the valve vaults that are required to be closed during accident conditions in order to maintain containment integrity are currently required to be inspected once every 31 days. The main steam valve vaults contain areas of high temperature and areas with significant physical congestion. As a result of these conditions, the valve vaults contain significant personnel hazards. Inspection of valves located in the valve vaults, which are also located in physically congested areas and/or areas of high temperature, represents a personnel hazard that could be avoided. Approval of this change would reduce the amount of time employees are required to be exposed to these personnel hazards in order to maintain compliance with TS. Also, the location of the rooms themselves, as well as the difficulty in moving from one exit to the other, tends to make these rooms destinations rather than paths to other areas. These factors combine to make the valve vaults low traffic areas. The proposed reduction of inspection frequency for these valves would be consistent with their location in a low traffic area and with their function which does not require routine manipulation during operation.

This TS change would require that the components be inspected during cold shutdown rather than once every 31 days.

Justification for Changes

The valves to be excluded from the 31-day examination requirement are various drain valves and test connections within the containment isolation boundary for the main steam and feedwater systems that are locked, sealed, or otherwise secured. The affected valves are located in the main steam valve vaults. Because of the process fluid in these lines, any nonisolated line would become obvious because of the resulting influx of steam into the area, which could either be detected from temperature indication in the valve vaults or by the observance of steam escaping from the vents in the valve vault roof.

Because of the environment in the general area, certain administrative controls are in effect to protect personnel that must enter these areas. An evaluation must be performed by the safety staff of all work activities during Mode 1, 2, or 3 in the main steam valve vaults that are to exceed 10 minutes in duration. For valves in a high-heat stress area, the AUO performing the inspection would either take a second individual along in observance of the buddy rule or would remain in constant contact with someone outside the room who could assist in case of emergency.

The valve vaults are typically a very low traffic area because of the congestion and high temperatures. This is especially true during operation when temperatures may reach or exceed 135 degrees in certain areas of the room. In addition, even though the valve vaults have two doors on opposing sides of the room, the significant physical congestion (including piping, valves, structural steel and platforms) between those doors makes the use of this room as a pathway to another destination impractical. As a result of these conditions, the valve vaults are a very low traffic area. These conditions make it very unlikely that a valve in this area that is relied on to maintain containment integrity would become misaligned. This is in addition to the administrative controls in place to have the valves locked, sealed, or otherwise secured.

Environmental Impact Evaluation

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

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

ENCLOSURE 3

PROPOSED TECHNICAL SPECIFICATION CHANGE

SEQUOYAH NUCLEAR PLANT (SQN) UNITS 1 AND 2

DOCKET NOS. 50-327 AND 50-328

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DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

Significant Hazards Evaluation

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

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

The proposed change will exempt containment isolation valves in the east and west main steam valve vaults from examination every thirty one days if those valves are locked, sealed or otherwise secured. The valves and flanges that are located inside the main steam valve vaults and are required to be closed during accident conditions, will be verified in their required position during cold shutdown and will be secured in this position. The environmental conditions in these areas ensure they will be low traffic areas where the probability of misalignment or manipulation is remote. Loss of containment integrity is not considered to be an initiator of any accident. This change does not affect any accident analysis assumptions or results for SQN. Therefore, there is no increase in the probability or consequences of an accident previously evaluated, as a result of this change.

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

This revision will not change any plant equipment, system configurations, or accident assumptions. The appropriate components in the valve vaults will continue to be verified in the closed position and locked, sealed, or otherwise secured. The physical congestion and high temperatures in the area will be effective in maintaining this as a low traffic area that will contribute to the low probability of misalignment or manipulation of these components between inspections. Therefore, this change will not affect the safety function of these components and will not create the possibility of a new or different kind of accident.

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

The proposed change is consistent with current SQN accident analysis assumptions since only the time interval between performances of the surveillance is being extended. This change will not impact any margin of safety.