ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION
SEQUOYAH NUCLEAR PLANT
UNITS 1 AND 2

TVA-SQN-TS-48

CHANGE IN THE ACTION REQUIREMENTS FOR THE
SUBCOOLING MARGIN MONITOR (T/S 3.3.3.7)

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.7 The accident monitoring instrumentation channels shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. With the number of OPERABLE accident monitoring instrumentation channels, except for the RCS subcooling margin monitor, less than the Required Number of Channels shown in Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 7 days, or be in at least HOT SHUTDOWN within the next 12 hours.

b. With the number of OPERABLE accident monitoring instrumentation channels less than the MINIMUM CHANNELS OPERABLE requirements of Table 3.3-10, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

c. With the RCS subcooling margin monitor inoperable, the margin will be verified once per shift until the monitor is restored to OPERABLE status. With the monitor operable for more than (2) hours, prepare and submit a special report to the NRC,Region II, pursuant to specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the channel to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.3.3.7 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

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c. With the RCS subcooling margin monitor inoperable, the margin will be verified once per shift until the monitor is restored to OPERABLE status. With the monitor operable for more than (2) hours, prepare and submit a special report to the NRC,Region II, pursuant to specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the channel to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.3.3.7 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

ENCLOSURE 2

JUSTIFICATION FOR PROPOSED TECHNICAL SPECIFICATION CHANGE
TVA-SQN-TS-48
SEQUOYAH NUCLEAR PLANT

This change will allow continued plant operation while requiring verification of the subcooling margin by utilization of existing instrumentation. The revised action statement will require a special report to be submitted to the NRC, Region II, if a subcooling margin monitor is inoperable for more than two hours. This special report will be submitted in lieu of a Licensee Event Report (LER).

The subcooling margin monitor provides information that is available from other sources. TVA's training program includes training on verifying adequate subcooling margin using pressure and temperature instrumenttion and the steam tables. This change will also avoid the need for an emergency technical specification change in the event that the monitor is inoperable for more than 7 days. Attachment 1 provides the significant hazards consideration determination. The proposed change was evaluated pursuant to 10 CFR Part 50.92, and no significant hazards considerations are involved.

ATTACHMENT 1

SIGNIFICANT HAZARDS CONSIDERATIONS DETERMINATION

1. Is the probability of an occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report increased?

The subcooling margin monitor is a NUREG-0737 requirement. The existing instrumentation provided sufficient information to determine whether there was an adequate subcooling margin. The operators are trained to use the pressure and temperature indication to verify the existence of adequate subcooling. The subcooling monitor does not provide any accident mitigating function, and its loss will not increase the probability or consequences of an accident.

2. Is the possibility for an accident or malfunction of a different type than evaluated previously in the safety analysis report created?

Temporary loss of the subcooling monitor will not create a new accident scenario. The loss of information is compensated for by existing instrumentation and operator training.

3. Is the margin of safety as defined in the basis of any technical specification reduced?

The monitor does not provide a protective function. Its loss will not change the margin to safety. Alternate methods of determining adequate subcooling are already in place.