

ENCLOSURE 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE

SEQUOYAH NUCLEAR PLANT (SQN) UNIT 2

DOCKET NO 50-328

(TVA-SQN-TS-95-13)

LIST OF AFFECTED PAGES

Unit 2

Operating License Page 11

s. Primary Coolant Outside Containment (Section 22.2. III.D.1.1)

Prior to exceeding 5 percent power Level, TVA is required to complete the leak tests on Unit 2, and results are to be submitted within 30 days from the completion of the testing.

(17) Surveillance Interval Extension

REPLACE  
WITH  
ATTACHED  
INSERT

The performance interval for those surveillance requirements identified in the licensee's request for surveillance interval extension dated February 8, 1994, shall be extended to July 15, 1994, to coincide with the Cycle 6 refueling outage. The extended interval shall not exceed a total of 28 months for 18-month surveillances and 46 months for the 3-year surveillance.

R170

- D. Exemptions from certain requirements of Appendices G and J to 10 CFR Part 50 are described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report, Supplements No. 1 and No. 5. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the regulations of the Commission.

A temporary exemption from General Design Criterion 57 found in Appendix A to 10 CFR part 50 is described in the Office of Nuclear Reactor Regulation's Safety Evaluation Report, Supplement No. 5, Section 6.2.4. This exemption is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest. The exemption, therefore, is hereby granted and shall remain in effect through the first refueling outage as discussed in Section 6.2.4 of Supplement 5 to the Safety Evaluation Report. The granting of the exemption is authorized with the issuance of the Facility Operating License. The facility will operate, to the extent authorized herein, in conformity with the application as amended, the provisions of the Act, and the regulations of the Commission. Additional exemptions are listed in attachment 2.

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E. Physical Protection

The Licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revision to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Safeguards Contingency Plan is incorporated into the Physical Security Plan. The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Sequoyah Physical Security Plan," with revisions submitted through November 23, 1987; and "Sequoyah Security Personnel Training and Qualification Plan," with revisions submitted through April 16, 1987. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

R65

INSERT

(17) Surveillance Interval Extension

The performance interval for the 36-month surveillance requirements in TS 4.3.2.1.3 shall be extended to May 4, 1996, to coincide with the Cycle 7 refueling outage. The extended interval shall not exceed a total of 49.5 months for the 36-month surveillances.

ENCLOSURE 2

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE

SEQUOYAH NUCLEAR PLANT (SQN) UNIT 2

DOCKET NO 50-328

(TVA-SQN-TS-95-13)

DESCRIPTION AND JUSTIFICATION FOR

EXTENSION OF RESPONSE TIME SURVEILLANCES

### Description of Change

TVA proposes to modify the Sequoyah Nuclear Plant (SQN) Unit 2 technical specifications (TSs) by revising the expired License Condition 2.C.(17). The proposed revision will extend the required surveillance interval to May 4, 1996, for Surveillance Requirement (SR) 4.3.2.1.3 for engineered safety features response time. This SR extension request involves 36-month response time verifications for safety injection, feedwater isolation, containment isolation Phase A, auxiliary feedwater pump, essential raw cooling water system, emergency gas treatment system, containment spray, containment isolation Phase B, turbine trip, 6.9-kilovolt shutdown board-degraded voltage or loss of voltage, and automatic switchover to containment sump actuations. The proposed extension will limit the interval past the allowable extension provided by TS 4.0.2 to 4.5 months for the 36-month surveillances.

### Reason for Change

SQN's Unit 2 experienced an extended forced outage during Cycle 6 operation. This forced outage resulted in a delay between Cycle 6 and 7 operation and has created difficulty in meeting the required surveillance interval for many surveillances performed during refueling outages. As a result, TVA requested and received NRC approval to extend several surveillances for the Unit 2 Cycle 6 refueling outage. During this outage, TVA intended to return all affected surveillances to a schedule that would eliminate the need to process additional extension requests. However, 24 response-time surveillance procedures associated with TS 4.3.2.1.3, that will expire before the Cycle 7 refueling outage, were overlooked. TVA performed 20 of the 24 procedures during a Mode 5 forced outage in April 1995 to maintain the required surveillance frequency. The 4 remaining surveillance procedures could not be performed without significantly extending the duration of the forced outage. The first of the remaining 4 procedures will exceed the 36-month surveillance interval, plus the 25 percent extension provided by TS 4.0.2, on December 20, 1995, and the last will occur on February 8, 1996.

These surveillance procedures cannot be performed during power operation without risking a unit transient. Therefore, performance of these SRs under the existing TS requirements would require testing at power or an unnecessary plant shutdown before December 20, 1995. The Cycle 7 refueling outage for Unit 2 is currently scheduled for April 19, 1996. To allow for unforeseen impacts to the operating capacity factor, TVA is asking to extend the proposed surveillances to May 4, 1996.

### Justification for Changes

The proposed change is temporary and allows a 1-time extension of a 36-month surveillance requirement for Cycle 7 to allow surveillance testing to coincide with the seventh refueling outage. The maximum surveillance interval increase during which the plant is operating at power will be less than four and one-half months, and will not affect the reliability established by surveillance testing performed at normal intervals.

TS 4.0.2 is an administrative control that ensures surveillance tests are performed periodically and defines a reasonable extension period for such testing. The basis for this specification describes the SRs as "sufficient to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval." TVA has concluded that the reliability defined by the normal surveillance intervals (e.g., daily, weekly, monthly) will not be significantly reduced by the extension. This conclusion is based on the following considerations for extending surveillances.

Response time tests are performed on instrumentation loops from the sensor to the final actuating device. These tests involve timing of the sensor, Eagle 21 components, solid state protection system (SSPS) logic and relays, and the final actuating device to determine an overall instrumentation loop response time. For the Eagle 21 components, the major contributor to response time is loop cycle time, which is verified by each quarterly functional test performed within that rack. The SSPS logic is tested on a bi-monthly interval to verify functionality and supports acceptable response time capability. The required response time intervals for the Eagle 21 and SSPS logic are 309 and 6 milliseconds, respectively, and are not a significant contributor to overall loop response time. The sensors, SSPS relays, and final actuating devices are tested at refueling outages to assess the acceptability of their response times.

The sensors involved in the response time tests include pressure transmitters and differential pressure transmitters. A review of the past three surveillance performances for these devices did not indicate time-based trends that would result in exceeding response time requirements considering the proposed extension. Industry positions support the consideration of eliminating response time testing for transmitters and switches. This consideration is based on extensive evidence that these devices do not exhibit response time drift over a period of time. In general, the testing for response times of these devices in the industry has not detected response time failures that would not be identified by calibrations, functional testing, or channel checks. Therefore, channel checks, that will continue to be performed during the remainder of the fuel cycle, will provide reasonable confidence that the sensors are functional and that expected response times will remain within acceptable response time limits.

The SSPS relays that would require the proposed extension for response time considerations have not exhibited response time drift. Review of past response time tests have verified this position and do not indicate changes in tested values as a result of test intervals. The repeatability of response times associated with the operation of relays and the historical data supports the proposed change to extend the response time surveillances.



The majority of the final actuation devices for response time testing are valves. The affected valves for the proposed extension primarily involve those that are also tested by the Section XI Program. Of the valves not in the Section XI Program, a review of recent tests did not indicate a failure to meet the response time requirements. Recent response time tests for the other final actuation devices, which includes pumps and breakers, were also reviewed and no adverse trends were identified. The historical results of past response time tests, along with most valves also being tested in the Section XI Program, provide adequate confidence that response times will remain within acceptable values for the proposed extension interval.

#### Environmental Impact Evaluation

The proposed change does not involve an unreviewed environmental question because operation of SQN Unit 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

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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 is temporary and allows a one-time extension of Surveillance Requirement 4.3.2.1.3 for Cycle 7 to allow surveillance testing to coincide with the seventh refueling outage. The proposed surveillance interval extension will not cause a significant reduction in system reliability nor affect the ability of the systems to perform their design function. Current monitoring of plant conditions and continuation of the surveillance testing required during normal plant operation will continue to be performed to ensure conformance with TS operability requirements. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Extending the surveillance interval for the performance of specific testing will not create the possibility of any new or different kind of accidents. No changes are required to any system configurations, plant equipment, or analyses. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Surveillance interval extensions will not impact any plant safety analyses since the assumptions used will remain unchanged. The safety limits assumed in the accident analyses and the design function of the equipment required to mitigate the consequences of any postulated accidents will not be changed since only the surveillance test interval is being extended. Historical performance generally indicates a high degree of reliability, and surveillance testing performed during normal plant operation will continue to be performed to verify proper performance. Therefore, the plant will be maintained within the analyzed limits, and the proposed extension will not significantly reduce the margin of safety.