



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

September 7, 1995

TVA-SQN-TS-95-15, Revision 1

10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of
Tennessee Valley Authority

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Docket No. 50-327

SEQUOYAH NUCLEAR PLANT (SQN) - TECHNICAL SPECIFICATION (TS)
CHANGE 95-15, REVISION 1, "ALTERNATE PLUGGING CRITERIA FOR STEAM
GENERATOR (S/G) TUBING - UNIT 1"

Reference: TVA letter to NRC dated July 19, 1995, "Sequoyah Nuclear Plant (SQN) -
Technical Specification (TS) Change 95-15, 'Alternate Plugging Criteria for
Steam Generator (S/G) Tubing - Units 1 and 2'"

In accordance with 10 CFR 50.90 we are enclosing a requested amendment to
License DPR-77 to change the TSs of SQN Unit 1. The proposed change revises TS
surveillance requirements and bases to incorporate alternate S/G tube plugging criteria
at tube support plate (TSP) intersections. The approach follows the guidance given in
the Generic Letter (GL) 95-05, "Voltage-Based Tubes Affected by Outside Diameter
Stress Corrosion Cracking," for alternate plugging criteria.

By the referenced letter, TVA submitted TS Change 95-15 for SQN Units 1 and 2.
Subsequent to TVA's TS change request, NRC issued GL 95-05 that contained
guidance for licensees who may wish to request a TS change for implementing
alternate S/G tube repair criteria. On August 25, TVA held discussions with NRC staff
concerning differences that existed between TVA's TS Change 95-15 submittal and
NRC GL 95-05. Two specific differences involved S/G tube inspection of dented TSP
intersections and probe wear. During a subsequent phone call with the NRC staff on
August 28, 1995, additional staff questions were discussed concerning Unit 1. TVA
staff addressed the following topics:

1. TVA's inspection plan for dents.
2. Probe wear.
3. Tube pulls planned for the upcoming Unit 1 Cycle 7 refueling outage.

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4. Probe variability.
5. Content of TVA's amendment request and conformance with GL 95-05.
6. Unit 2 applicability.

Following a discussion of the above topics, it was recognized that some of the differences between TVA's proposed TS Change 95-15 and GL 95-05 were generic industry issues that would not be resolved prior to SQN's upcoming Unit 1 Cycle 7 refueling outage scheduled to begin September 9, 1995. NRC recommended that TVA limit the proposed TS change to Unit 1 only and provide additional information on the topics discussed. Accordingly, TVA is submitting TS Change 95-15, Revision 1 for Unit 1 only and withdrawing the Unit 2 TS change request.

TVA is aware that probe wear is an unresolved industry issue. When a resolution of this issue is achieved, SQN will utilize the NRC approved method. Until that time, SQN will implement the inspection/reinspection requirements of Enclosure 4 for one cycle of operation on Unit 1 (Cycle 8).

In addition, TVA will follow the industry approach to probe variability. Enclosure 4 contains the description of SQN's program for probe variability.

The proposed TS change is identified in Enclosure 1. The justification of the proposed TS change is provided in Enclosure 2. A TVA commitment is provided in Enclosure 3. The responses to CL 95-05 are provided in Enclosure 4. Additional information requested during the August 28, 1995, phone call is provided in Enclosure 5. Note that the information provided in Enclosure 5, Item 2, is representative of the dent distribution data.

Please note that the no significant hazard determination previously provided remains bounding for the proposed revision.

This change request is being reviewed by TVA's Nuclear Safety Review Board (NSRB) in parallel with NRC review. Any changes resulting from the NSRB review will be provided to NRC in a timely manner.

While S/G TSP tube degradation at SQN is not expected to be significant, TVA is submitting this TS change in advance of the upcoming Unit 1 Cycle 7 refueling outage to prevent an exigent request for alternate plugging criteria implementation. If a sufficiently high number of TSP outside diameter stress corrosion cracking indications are detected during SQN's Unit 1 Cycle 7 refueling outage, use of the proposed alternate plugging criteria will be preferred. Therefore, NRC approval of this TS change is requested before September 19, 1995, to support the Unit 1 S/G tube inspection activities.

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Please direct questions concerning this issue to D. V. Goodin at 843-7734.

Sincerely,

R. H. Shell

R. H. Shell
Manager
SQN Site Licensing

Sworn to and subscribed before me
this 7th day of September 1995

George M. Billingsley
Notary Public
My Commission Expires Oct 21, 1998

Enclosures

cc (Enclosures):

D. E. LaBarge, Project Manager
Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852-2739

Mr. Michael H. Mobley, Director (w/o Enclosures)
Division of Radiological Health
3rd Floor
L & C Annex
401 Church Street
Nashville, Tennessee 37243-1532

NRC Resident Inspector
Sequoyah Nuclear Plant
2600 Igou Ferry Road
Soddy-Daisy, Tennessee 37379-3624

Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323-2711