

SEP 04 1985

Docket Nos. 30-19101
30-19102

License Nos. 41-08165-14
01-21075-01

Tennessee Valley Authority
ATTN: Mr. Hugh G. Parris
Manager of Power and
Engineering (Nuclear)
500A Chestnut Street Tower II
Chattanooga, Tennessee 37401

Gentlemen:

We have received your letter of June 19, 1985, which advises the Nuclear Regulatory Commission (NRC) of Tennessee Valley Authority's (TVA) plans to implement changes to the container handling procedures for the licensed low-level waste (LLW) storage activities at the Sequoyah and Browns Ferry Nuclear Plants. We have reviewed the letter and Material License Nos. 41-08165-14 and 01-21075-01 and have determined that license amendments are warranted.

These licenses were issued with the intent that the authorized LLW storage activities would be conducted as an integral part of the overall station operations using already established TVA plant practices and procedures. We recognize that these types of planned procedural changes, if implemented under TVA's reactor operating licenses, could be done under 10 CFR Section 50.59. With this in mind, and in anticipation of the need for similar procedural changes in the future, we suggest that instead of amending the LLW storage licenses for the specific container handling procedures mentioned in your letter, you request amendments that would establish administrative and record keeping procedures for TVA internal review, safety evaluation and approval of necessary changes in equipment and container handling procedures. We anticipate this internal review process to be similar to that which allows TVA to evaluate and use other containers not originally specified in the license applications. This type of amendment would provide greater operational flexibility and facilitate a more orderly conduct of TVA's business.

Your amendment request should as a minimum include: the TVA reviewing organizations and their responsibilities, the person(s) within the reviewing organizations having approval authority, the type of equipment and procedural changes that TVA can make without prior Commission approval, the records to be kept, the necessary reports to the NRC, and the criteria to be used in the safety evaluation and review of proposed changes. Enclosed is a suggested list of some appropriate conditions and criteria that may assist you in developing review procedures.

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If you have any questions please call Fritz Sturz at (301) 427-4205.

Sincerely,

Leland C. Rouse, Chief
Advanced Fuel and Spent Fuel
Licensing Branch
Division of Fuel Cycle and
Material Safety

Enclosure: As stated

Distribution: Please return concurrence
copy to FBrown SS 396
Docket 30-19101, 30-19102 (50-259/260/296)
(50-327/328)

PDR & LPDR
NMSS R/F
FCAF R/F
RGPerlis
EAdensam RClark WLong
Region II CStahle
DBVassallo, NRR
GJohnson
LCRouse
PLoyesen
FSturz
FBrown (LA file)

OFC: FCAF	: FCAF	: FCAF	:	:	:	:
NAME: ES	: PLoyesen	: LCRouse	:	:	:	:
DATE: 8/3/85	: 9/4/85	: 9/4/85	:	:	:	:

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SUGGESTED CONDITIONS AND CRITERIA

1. Require written procedures for LLW storage operations.
2. Those equipment and procedural changes that TVA may make without prior Commission approval are those which involve no changes in the license conditions or unreviewed safety questions.
3. There should be no significant change in the type or increase in the amounts of effluents released offsite.
4. There should be no significant increase in individual or cumulative occupational radiation exposure.
5. There should be no possibility for an accident or malfunction of a different type than evaluated in the license application and NRC safety evaluation report (SER).
6. There should be no increase in the probability of occurrence or consequences of accidents previously evaluated in the license application or NRC SER.
7. There should be no increase in the resultant environmental impacts originally evaluated for the issuance of the license.
8. Records shall be maintain of all equipment and procedural changes. These records shall include a written safety evaluation which provides the bases for the determination that the change does not involve and unreviewed safety question and that the change meets other appropriate evaluation criteria. These records shall be maintained for five (5) years.
9. An annual report containing a brief description of the such changes and a summary of the safety evaluation of each shall be furnished to the NRC Regional Office and the Director, Nuclear Material Safety and Safeguards, U. S. NRC, Washington, D. C., 20555.