From:	Perry Buckberg
Sent:	Thursday, December 8, 2022 6:50 PM
To:	Taylor, Andrew Charles
Cc:	Wells, Russell Douglas
Subject:	Request for Additional Information - SQN & WB Request to Revise Technical Specification 3.4.12 L-2022-LLA-0103
Attachments:	RAI - SQN and WBN TS 3.4.12 SNSB L-2022-LLA-0103 12-8-2022.pdf

Dear Mr. Taylor,

By letter dated July 27, 2022 (ADAMS Accession No. ML22209A002), the Tennessee Valley Authority (TVA) submitted a License Amendment Request for the Sequoyah Nuclear Plant, Units 1 and 2, and Watts Bar Nuclear Plant, Units 1 and 2, to revise each plant's Technical Specification 3.4.12.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has identified areas where additional information is needed to complete its review. A draft request for additional information (RAI) was transmitted to you by an email dated December 6, 2022. TVA reviewed the draft RAI and no changes were needed. TVA agreed to respond to the attached final RAI within 30 days.

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact Perry Buckberg at (301) 415-1383 or via email at Perry.Buckberg@nrc.gov.

Thanks,

Perry Buckberg
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U.S. Nuclear Regulatory Commission
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Hearing Identifier: NRR_DRMA
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Subject: Request for Additional Information - SQN & WB Request to Revise Technical Specification 3.4.12 L-2022-LLA-0103
Sent Date: 12/8/2022 6:50:22 PM
Received Date: 12/8/2022 6:50:00 PM
From: Perry Buckberg

Created By: Perry.Buckberg@nrc.gov

Recipients:
"Wells, Russell Douglas" <rdwells0@tva.gov>
Tracking Status: None
"Taylor, Andrew Charles" <actaylor@tva.gov>
Tracking Status: None

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MESSAGE	1436	12/8/2022 6:50:00 PM	
RAI - SQN and WBN TS 3.4.12 SNSB L-2022-LLA-0103 12-8-2022.pdf	92165		

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

REQUEST FOR ADDITIONAL INFORMATION
RELATED TO CHANGES TO TECHNICAL SPECIFICATION 3.4.12 FOR SEQUOYAH NUCLEAR PLANT, UNITS 1 & 2, AND WATTS BAR NUCLEAR PLANT, UNITS 1 & 2
DOCKET NOS. SEQUOYAH: 50-327, 50-328 AND WATTS BAR: 50-390, 50-391
EPID: L-2022-LLA-0103

INTRODUCTION

By letter dated July 27, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML 22209A002), Tennessee Valley Authority (TVA, the licensee) submitted a license amendment request (LAR) for the Sequoyah Nuclear Plant (SQN), Units 1 and 2, and the Watts Bar Nuclear Plant (WBN), Units 1 and 2 respectively, to the U.S. Nuclear Regulatory Commission (NRC, the Commission).

The requested change would revise SQN Units 1 and 2 Technical Specification (TS) 3.4.12, "Low Temperature Overpressure Protection (LTOP) System," and the WBN Units 1 and 2 TS 3.4.12 "Cold Overpressure Mitigation System (COMS)," to add a note to the Limiting Condition for Operation (LCO) that one safety injection pump and one charging pump may be capable of injecting into the reactor coolant system (RCS) for purpose of testing in MODE 5 (cold shutdown) or MODE 6 (refueling) with the pressurizer manway cover removed to provide a vent path for adequate pressure relief. For the review of this LAR, the NRC Staff has drafted the request for additional information (RAI) below.

Regulatory Basis

10 CFR 50 Appendix A- General Design Criterion 15 which states:

> The Reactor Coolant (RC) System and associated auxiliary, control, and protection systems shall be designed with sufficient margin to assure that the design conditions of the reactor coolant pressure boundary are not exceeded during any condition of normal operation, including anticipated operational occurrences.

SNSB-RAI-1:

In section 3.0 of the enclosure to the LAR, the licensee states that an analysis was performed, for both SQN and WBN, to justify that the pressurizer manway opening is sufficient to prohibit the pressurization of the RCS if a safety injection pump was also capable of injecting during the LTOP/COMS modes of applicability. Based on the analysis performed, the licensee concluded that the relief capacity of the of the pressurizer manway is more than sufficient to address the combined multiple injection transient of the charging pump and safety injection pump.

Please provide the calculations performed for both SQN and WBN units which verify the licensee conclusion of the pressurizer manway being sufficient to relief the RCS pressure during combined multiple injection transient of the charging pump and safety injection pump.