

Analysis Report for staff approval. This information supersedes the information contained in the letters referenced in the License Conditions listed above and would be maintained in accordance with the 10 CFR 50.59 process.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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 involves the deletion of license conditions that authorized TVA to operate SQN's postaccident sampling (PAS) system. TVA proposed change establishes programmatic control of SQN's PAS system under SQN TS 6.8.4.e and the SQN Final Safety Analysis Report. Any future changes to SQN's PAS Program would be governed by the 10 CFR 50.59 process. PAS and analysis will continue at SQN through grab sample acquisition and laboratory analysis and will continue to meet the PAS objectives in NUREG-0737, Item II.B.3 and Regulatory Guide 1.97, Revisions 2. Accordingly, the proposed change does not affect the probability or consequences of an accident.

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

The proposed change involves improvements in the operational reliability of SQN's PAS system by using more reliable laboratory analysis methods, reducing sampling personnel radiation dose, and incorporating practical methods for sample acquisition and analysis. Because the proposed change involves license conditions and sampling methods that are utilized for postaccident recovery, the potential for an unanalyzed accident is not created. Consequently, no new failure modes are introduced.

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

Plant safety margins are established through limiting conditions of operation, limiting safety system settings, and safety limits specified in the TSs. As a result of the proposed amendment, there will be no change to either the physical design of the plant or to any of these settings and limits. The proposed changes do not affect the safe operation of SQN. Therefore, there are no changes to any of the margins of safety.

The NRC has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

*Local Public Document Room location:* Chattanooga-Hamilton County Library, 1101 Broad Street, Chattanooga, Tennessee 37402.

*Attorney for licensee:* General Counsel, Tennessee Valley Authority, 400 West Summit Hill Drive, ET 11H, Knoxville, Tennessee 37902.

*NRC Project Director:* Frederick J. Hebdon.

*Tennessee Valley Authority, Docket Nos. 50-327 and 50-328, Sequoyah Nuclear Plant, Units 1 and 2, Hamilton County, Tennessee*

*Date of amendment request:* April 6, 1995 (TS 94-18).

*Description of amendment request:* The proposed change would revise Surveillance Requirement (SR) 4.0.5 by replacing the current Inservice Inspection program requirements with the requirements stated in the Standard Technical Specifications (NUREG-1431). As a result, SR 4.0.5 would more clearly specify the inservice inspection (ISI) program requirements and the inservice testing (IST) program requirements of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components. The licensee also proposed deletion of Technical Specification 3/4.4.10, "Structural Integrity ASME Code Class 1, 2 and 3 Components," and its related Bases information.

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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.

Operation of the facility in accordance with the proposed amendment would not involve any increase in the probability of occurrence or consequences of an accident previously evaluated. The Inservice Inspection and Testing Programs, pursuant to 10 CFR 50.55a are described in the TSs. The proposed amendment, in accordance with NUREG-1431 and draft NUREG-1482 permits relief from an American Society of Mechanical Engineers (ASME) code requirement in the interim between the time of submittal of a relief request and NRC approval of the relief. The changes being proposed do not affect assumptions contained in plant safety analyses or change the physical design and/or operation of the plant, nor do they affect TSs that preserve

safety analysis assumptions. Any relief from the approved ASME Section XI code requirements that is implemented prior to NRC review and approval will require evaluation under the 10 CFR 50.59 process to determine that no TS changes or unreviewed safety questions exist. This evaluation process will ensure that the impact of any code relief is thoroughly evaluated and that the structures, systems, and components remain in conformance with assumptions made in the safety analysis. The proposed change to delete SQN TS 3/4.4.10, Structural Integrity, does not affect plant safety analyses or change the physical design or operation of the plant. The proposed amendment relocates the structural integrity requirements under the existing TS Surveillance Requirement (SR) 4.0.5 to allow these requirements to be governed and controlled within the inservice inspection (ISI) program. Therefore, operation of the facility in accordance with the proposed amendment would not affect 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.

Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. The Inservice Inspection and Testing Programs, pursuant to 10 CFR 50.55a are described in the TSs. The proposed amendment, in accordance with NUREG-1433 and draft NUREG-1482, permits relief from an ASME code requirement in the interim between the time of submittal of a relief request and NRC approval of the relief. The changes being proposed will not change the physical plant or the modes of operation defined in the Facility License. The changes do not involve the addition or modification of equipment nor do they alter the design or operation of plant systems. Any relief from the approved ASME Section XI code requirements that is implemented prior to NRC review and approval will require evaluation under the 10 CFR 50.59 process to determine that no TS changes or unreviewed safety questions exist. This evaluation process will ensure that the impact of the code relief is thoroughly evaluated and that the structures, systems, and components remain in conformance with assumptions made in the safety analysis. The proposed change to delete SQN TS 3/4.4.10 does not affect plant safety analyses or change the physical design or operation of the plant. The proposed amendment relocates the structural integrity requirements under the existing TS SR 4.0.5 to allow these requirements to be governed and controlled within the ISI program. Therefore, operation of the facility in accordance with the proposed amendment would 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.

Operation of the facility in accordance with the proposed amendment would not involve any reduction in a margin of safety.