

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 revisions do not alter the plant features or operating practices. This revision will reduce unnecessary starts of the diesel generators (D/Gs) when a common cause failure is not involved or for an inoperable offsite circuit. This change will not affect the accident mitigation capabilities of the D/Gs, but should improve the reliability by reducing the wear and tear associated with starting the D/Gs. The D/Gs are not the source of a postulated accident and because this change does not alter plant functions or operating practices the probability of an accident is not increased. The D/G's operability will continue to be verified for conditions that indicate a potential common-cause failure to ensure accident mitigation capabilities are not affected. Therefore, this revision will continue to provide actions that will support alternating-current (ac) electrical power source safety functions without unnecessary degradation of the D/Gs and will not increase the consequences of an accident.

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

The D/Gs are not the source of accidents and the proposed revision will not alter plant functions or actions by more appropriately limiting the conditions when a D/G must be verified operable. Therefore, the possibility of a new or different accident is not created.

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

This revision does not alter plant functions that provide the margin of safety. The reduction of D/G testing will only be allowed for situations where the operable D/Gs are not affected by the conditions resulting in the ac power source inoperability. This reduced testing should improve D/G reliability for accident mitigation functions and further ensure the margin of safety provided by the D/Gs. Therefore, the margin of safety is not reduced by the proposed revision to limit unnecessary D/G starts.

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.

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*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 95-02).

*Description of amendment request:* The proposed change would add Limiting Condition for Operation 3.0.6 to allow equipment that has been removed from service or declared inoperable to be returned to service under administrative control in order to perform testing required to demonstrate operability. It would be applicable for operability testing of the inoperable equipment or other equipment that requires the operability feature to be in service in order to perform the test. A related change to the Bases would provide amplifying explanation on the use of this new provision. In addition, a proposed change to Action 18 of Table 3.3-3, "Engineered Safety Feature Actuation System Instrumentation," would clarify the time interval that an instrument channel may be in the bypass condition. For those instruments that reference Action 18, the change would allow the bypass for 6 hours.

*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 addition of the exception to TSs 3.0.1 and 3.0.2 and the definition for the time to place a channel in bypass will not change plant equipment or the operating practices at SQN. The exception will allow testing to be performed with inoperable equipment returned to service under administrative controls, but will not change functions. The function will be available from other redundant channels during the brief durations that the new provision would be utilized. The specified time interval to achieve a bypass condition will clarify the implementation of the action requirement with the affected functions remaining available through the redundant operable channels. This clarification does not change the intent of the action but does set the previously undefined time interval.

The proposed change affects actions associated with the actuation of functions to mitigate accidents and are not the source of an accident. Therefore, the probability of an accident is not increased. The affected

functions provide accident mitigation functions and the proposed revisions serve to ensure equipment can be maintained in required conditions within acceptable time intervals and administrative controls. The brief periods utilized for the TSs 3.0.1 and 3.0.2 exception will not significantly affect the accident mitigation capabilities because of the availability of redundant equipment. In addition, the benefit of performing operability testing to return equipment permanently to service or to maintain the operability of other equipment outweighs the slight reduction in safety function actuation redundancy. Therefore, the proposed change will not significantly increase the consequences of an accident.

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

The proposed changes affect functions utilized to mitigate an accident and are not the source of an accident. The exception provides reasonable flexibility to maintain equipment operability and the bypass time interval reduces the potential for damage to safety related equipment. Because plant functions are not changed as a result of this request the possibility of a new or different kind of accident is not created.

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

The proposed change does not alter setpoints or operating considerations that maintain the margin of safety for SQN. These changes provide needed flexibility to perform TS required testing and clarifications for implementing action requirements. These changes will slightly affect the redundancy of the affected safety functions but provide greater benefit for maintaining equipment in an operable condition. Therefore, the margin of safety provided by the affected equipment has not changed and the proposed change will not result in a reduction.

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.

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*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 94-04).

*Description of amendment request:* The proposed amendment would change the power range neutron flux channel calibration frequency