

surveillance requirement from monthly to every 31 effective full power days and delay the requirement to perform the surveillance for 96 hours after reaching 15 percent power. A proposed change to the Bases would provide amplifying information.

*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 likelihood that an accident will occur is neither increased or decreased by this TS change, which only affects when the first surveillance is performed following an outage and changes the frequency of performance of the surveillance. Before start-up following refueling outage, the power range high trip setpoint is set below 85 percent power, typically 60 percent, for conservatism. The power range low trip setpoint is set at 22 percent power, TS requires the setpoint to be less than or equal to 25 percent power. These settings are in addition to the conservatism built into start-up following a refueling outage. Therefore, delaying the first performance for 96 hours will not impact on the operation of the plant since the setpoints are set conservatively. Also, the change of the frequency to every 31 effective full power days (EFPD) only delays the surveillance when the plant is operated at reduced power. During operation at reduced power changes in the neutron flux are also reduced. Therefore, changing the frequency from monthly to every 31 EFPD allows slow changes in neutron flux during the fuel cycle to be more accurately detected and evaluated.

This TS change will not impact the function or method of operation of plant equipment. Thus, there is not a significant increase in the probability of a previously analyzed accident due to this change. No systems, equipment, or components are affected by the proposed change. Thus, the consequences of a malfunction of equipment important to safety previously evaluated in the Updated Final Safety Analysis Report are not increased by this change.

The proposed changes provide TS improvements that ensure the system operates within the bounds of SQN's accident analysis as contained in the Final Safety Analysis Report (FSAR) and only affects when a surveillance is performed. This change has no impact on accident initiators and does not involve a physical modification to the plant. Accordingly, the proposed changes do not involve an increase in 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.

This revision will not change any plant equipment, system configurations, or accident assumptions. This change will more accurately monitor changes in the condition of the core.

Fuel burn-up is necessary to change the relationship between the incore axial power and the excore detectors response. At reduced levels the effectiveness of the monitoring activity is reduced. Therefore, changing the frequency to 31 EFPD allows slow changes in neutron flux during the fuel cycle to be more accurately detected and evaluated. Delaying the first performance of the surveillance requirement, until 96 hours after reaching 15 percent rated thermal power, will allow the unit to be in a more stable condition. Therefore, this change will not affect the safety function of any components and will create the possibility of a new or different kind of accident.

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

The proposed changes provide TS improvements for SQN's power range monitoring system that ensure the system operates within the bounds of SQN's accident analysis as contained in the FSAR since only the time interval between performances of the surveillance is being extended. This change does not involve a physical modification to SQN's power range monitoring system. Accordingly, the margin of safety has not been reduced.

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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*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 95-08).

*Description of amendment request:* The proposed change would (1) change the core alteration definition to limit the term to reactor vessel internal activities that could have an affect on core reactivity, (2) change the quadrant power tilt ratio definition to eliminate the conflict in the definition of the term and its use in Surveillance Requirement 4.2.4.2, and (3) revise the Unit 1 Operational Modes parameters in Table

1.1 to be consistent with the description in Table 1.1 for Unit 2.

*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 changes provide TS improvements that ensure the plant operates within the bounds of SQN's accident analysis as contained in the Final Safety Analysis Report (FSAR) and only affects the definitions and does not have any affect on any work performed. The change to core alteration is to clarify those components that may result in reactivity changes. The change will not effect movement of fuel or components that effect reactivity, therefore, a fuel handling accident will not be effected. The change in the definition of quadrant power tilt ratio (QPTR) allows the alternate method of determining QPTR to be utilized. The current TS surveillance requirement (SR) and bases allow alternate means for determining QPTR, therefore, revising the definition will have no effect on any accident. The revision to the mode parameters is administrative in nature, therefore it will have no effect on any accident. This change has no impact on accident initiators and does not involve a physical modification to the plant. Accordingly, the proposed changes do not involve an increase in 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.

This revision will not change any plant equipment, system configurations, or accident assumptions. This change will better define the associated parameters and will eliminate potential ambiguity and confusion. The change in the definition of core alteration allows components that do not affect reactivity to be moved within the reactor vessel. The change in the definition will not effect the monitoring of QPTR with one channel inoperable. The core will be monitored in accordance with the SRs. Therefore, this change will not affect the safety function of any components and will not create the possibility of a new or different kind of accident.

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

The proposed changes provide improvements for SQN's TS. This change does not involve a physical modification to the plant nor change the methods of monitoring plant parameters. Accordingly, the margin of safety has not been reduced.