

Tennessee Valley Authority. Post Office Box 2000. Soddy-Daisy. Tennessee 37379

June 22, 1999

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

Gentlemen:

In the Matter of) Docket Nos. 50-327 Tennessee Valley Authority) 50-328

SEQUOYAH NUCLEAR PLANT (SQN) - REVISION TO THE TECHNICAL SPECIFICATION (TS) BASES (UNIT 1 REVISIONS ER-11, -12, AND -13 AND UNIT 2 REVISIONS BR-12, -13, AND -14) AND REVISION TO THE TECHNICAL REQUIREMENTS MANUAL (TRM) (REVISIONS 1, 2, AND 3)

The purpose of this letter is to inform NRC of changes that we have incorporated into the Bases section of the Units 1 and 2 TSs and the TRM. Specifically, the first Bases revision provides a clarification with regard to the proper application of the TS requirements for power distribution systems and the functions that the inverters provide to maintain operability. This change was needed to ensure uniform and conservative application of the requirements and to clarify conditions that would not require actions to initiate unit shutdown. The second Bases revision provides updated information based on recent analysis activities for the cold leg injection accumulators. This revision clarifies the applicability of instrument uncertainties as considered in the analysis. This revision also removes unnecessary detail in the Bases regarding design considerations for the 306000 accumulators.



9907010268 990622 PDR ADOCK 05000327 U.S. Nuclear Regulatory Commission Page 2 June 22, 1999

The first TRM revision involves changes to the requirements for testing safety-related snubbers. This revision will allow functional testing of snubbers with the unit on line provided certain limitations are implemented. This revision also enhances the TRM structure by utilizing equivalent numbering as was utilized in the TSs prior to relocation. The second revision modifies the Administrative Controls section of the TRM by providing an exception for specific TRM additions. These additions must be conservative with respect to the TSs and be used to implement temporary requirements to augment inadequate TS provisions in accordance with Administrative Letter 98-10. The final TRM revision implements a conservative addition that supplements the TS requirements with regard to the inoperability of radiation monitors that initiate control room isolation functions. This revision provides actions to be taken in the event that a single control room radiation monitor is inoperable. The revision also expands the applicability to include those periods when movement of irradiated fuel is in progress. TVA has submitted to NRC an amendment request to the TSs for the approval of these provisions after which the TRM will be revised to remove these temporary provisions.

The enclosure provides the revised TS Bases pages and TRM pages affected by these revisions.

Please direct questions concerning this issue to me at (423) 843-7170 or J. D. Smith at (423) 843-6672.

Sincerely,

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Disersing and Industry Affairs Manager

Enclosure

cc: See page 3

U.S. Nuclear Regulatory Commission Page 3 June 22, 1999

cc (Enclosure):

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