

of the plant to mitigate smoke infiltration has not changed. The new system will improve the environmental conditions in most situations and actually enhance the ability of the operators to perform their functions.

Given the above, an event that would result in preventing the operators from fulfilling their safety functions is not introduced by this change. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in margin of safety?

Response: No.

The new analysis was performed without crediting the existing Containment Post Accident Charcoal Filters and indicated that the Control Room and off-site doses remain within the required limits. Removal of the Post Accident Charcoal Filters from Technical Specification will not impact the operators' ability to function or significantly increase dose to the public.

The new Technical Specification surveillance limits for NaOH tank level and concentration establish criteria acceptable to meet the assumptions in the dose analysis.

The changes to the VFTP [Ventilation Filter Testing Program] program in Technical Specification reflect the removal of the Containment Post Accident Charcoal Filters consistent with the analysis, and the surveillance limits consistent with the new CREATS design.

The use of AST represents a change to a standardized and accepted dose calculation method.

The function of the CREATS system is to protect the operators and allow them to perform the necessary accident mitigation tasks. The proposed changes to the CREATS enhance this ability through improved redundancy and system operation. The analysis demonstrates that the Control Room will remain within prescribed limits during the design basis accidents. The operators will be able to perform their function and the public will be protected.

Therefore, the proposed change does not involve a significant reduction in a margin to safety.

The NRC staff 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 (SQN), Units 1 and 2, Hamilton County, Tennessee

Date of amendment request: May 22, 2003 (TSC 03-02).

Description of amendment request:

The proposed amendment would revise the limiting condition for operation for Technical Specification (TS) Section 3.7.5, "Ultimate Heat Sink." This revision would modify the required minimum ultimate heat sink (UHS) water elevation in TS 3.7.5.a from 670 feet to 674 feet. The maximum emergency raw cooling water (ERCW) temperature requirement in TS 3.7.5.b will be increased from 83 degrees Fahrenheit (°F) to 87 °F. Limiting condition for operation requirements that are now obsolete because of the proposed changes are being deleted, as well as expired footnote provisions.

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:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed change to increase the UHS maximum temperature and the minimum water level does not alter the function, design, or operating practices for plant systems or components. The UHS is utilized to remove heat loads from plant systems during normal and accident conditions. This function is not expected or postulated to result in the generation of any accident and continues to adequately satisfy the associated safety functions with the proposed changes. Therefore, the probability of an accident presently evaluated in the safety analyses will not be increased because the UHS function does not have the potential to be the source of an accident and no plant equipment is altered as a result of this change. The heat loads that the UHS is designed to accommodate have been evaluated for functionality with the higher temperature and elevation requirements. The result of these evaluations is that there are existing margins associated with the systems that utilize the UHS for normal and accident conditions. These margins are sufficient to accommodate the postulated normal and accident heat loads with the proposed changes to the UHS. Since the safety functions of the UHS are maintained, the systems that ensure acceptable offsite dose consequences will continue to operate as designed. Therefore, the proposed changes to TS 3.7.5 will not significantly increase the consequences of an accident previously evaluated based on safety functions continuing to meet their accident mitigation requirements and limiting dose consequences to acceptable levels.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The UHS function is not an initiator of any accident and only serves as a heat sink for normal and upset plant conditions. By

allowing the proposed change in the UHS temperature and elevation requirements, only the parameters for UHS operation are changed while the safety functions of the UHS and systems that transfer the heat sink capability continue to be maintained. The UHS function provides accident mitigation capabilities and does not reflect the potential for accident generation. Therefore, the possibility for creating a new or different kind of accident is not created because the UHS is only utilized for heat removal functions that are not a potential source for accident generation.

3. Does the proposed change involve a significant reduction in a margin of safety?

No. The proposed change has been evaluated for systems that are needed to support accident mitigation functions as well as normal operational evolutions. Operational margins were found to exist in the systems that utilize the UHS capabilities such that these proposed changes will not result in the loss of any safety function necessary for normal or accident conditions. The ERCW system has excess flow margins that will accommodate the increased flows necessary for the proposed temperature increase. While operating margins have been reduced by the proposed changes, safety margins have been maintained as assumed in the accident analyses for postulated events. Additionally, the proposed changes do not require the modification of component setpoints or operating provisions that are necessary to maintain margins of safety established by the SQN design. Therefore, a significant reduction in the margin to safety is not created by this proposed change.

The NRC staff 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 Section Chief: Allen G. Howe.

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

Date of amendment request: June 5, 2003 (TSC 03-07).

Description of amendment request:

The proposed amendment would revise Action b of Technical Specification (TS) 3.6.1.9, "Containment Ventilation System" to allow an alternative to returning the inoperable containment purge supply or exhaust valve to operable conditions for continued operation. The alternative ensures isolation of the affected flow path such that potential release paths to the environment are sufficiently restricted to meet regulatory limits. This change