

March 22, 2000

Complete NRC 058

Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
Tennessee Valley Authority
6A Lookout Place
1101 Market Street
Chattanooga, Tennessee 37402-2801

SUBJECT: WATTS BAR NUCLEAR PLANT, UNIT 1 - ISSUANCE OF EXIGENT
AMENDMENT REGARDING RESPONSE TIME TESTING FOR SOLENOID
VALVES (TAC NO. MA8274)

Dear Mr. Scalice:

The Commission has issued the enclosed Amendment No. 23 to Facility Operating License No. NPF-90 for Watts Bar Nuclear Plant, Unit 1. This amendment is in response to your application dated February 25, 2000.

The amendment revises Technical Specification Table 3.3.2-1, "Engineered Safety Feature Actuation System Instrumentation" to provide a one-time exception, until the next time the turbine is removed from service, from the requirement to perform response time testing for the solenoid valve 1-FSV-47-027. This amendment also supersedes the Notice of Enforcement Discretion granted on February 23, 2000 and confirmed by letter dated February 25, 2000 (00-6-004)

A copy of the safety evaluation is also enclosed. Notice of issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,
/RA/

Robert E. Martin, Senior Project Manager, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-390

Enclosures: 1. Amendment No. 23 to NPF-90
2. Safety Evaluation

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cc w/enclosures: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TENNESSEE VALLEY AUTHORITY

DOCKET NO. 50-390

WATTS BAR NUCLEAR PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 23
License No. NPF-90

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Tennessee Valley Authority (the licensee) dated February 25, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-90 is hereby amended to read as follows:

- (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 23, and the Environmental Protection Plan contained in Appendix B, both of which are attached hereto, are hereby incorporated into this license. TVA shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Project Licensing Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: **March 22, 2000**

ATTACHMENT TO AMENDMENT NO. 23

FACILITY OPERATING LICENSE NO: NPF-90

DOCKET NO. 50-390

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

Remove Pages

3.3 - 36
B 3.3 - 119
B 3.3 - 120

Insert Pages

3.3 - 36
B 3.3 - 119
B 3.3 - 120

Table 3.3.2-1 (page 3 of 7)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NORMAL TRIP SETPOINT
4. Steam Line Isolation (continued)						
c. Containment Pressure-High High	1,2 ^(c) ,3 ^(c)	4	E	SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.9 SR 3.3.2.10	≤ 2.9 psig	2.8 psig
d. Steam Line Pressure						
(1) Low	1,2 ^(c) 3 ^{(a)(c)}	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.9 SR 3.2.10	≥ 666.6 ^(b) psig	675 ^(b) psig
(2) Negative Rate-High	3 ^{(d)(c)}	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.9 SR 3.3.2.10	≤ 108.5 ^(e) psi	100 ^(e) psi
5. Turbine Trip and Feedwater Isolation						
a. Automatic Actuation Logic and Actuation Relays	1,2 ^(f) 3 ^(f)	2 trains	H	SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.5	NA	NA
b. SG Water Level-High High(p-14)	1,2 ^(f) 3 ^(f)	3 per SG	I	SR 3.3.2.1 SR 3.3.2.4 SR 3.3.2.9 SR 3.3.2.10 (h)	≤ 83.1%	82.4%
c. Safety Injection	Refer to Function I (Safety Injection) for all initiation functions and requirements.					
d. North MSV Vault Room Water Level - High	1,2 ^{(f),(g)}	3/Vault Room	O	SR 3.3.2.6 SR 3.3.2.9	≤ 5.31 inches	4 inches
e. South MSV Vault Room Water Level - High	1,2 ^{(f),(g)}	3/Vault Room	O	SR 3.3.2.6 SR 3.3.2.9	≤ 4.56 inches	4 inches

(continued)

- (a) Above the P-11 (Pressurizer Pressure) interlock.
- (b) Time constants used in the lead/lag controller are $t_1 \geq 50$ seconds and $t_2 \leq 5$ seconds.
- (c) Except when all MSIVs are closed and de-activated.
- (d) Function automatically blocked above P-11 (Pressurizer Interlock) setpoint and is enabled below P-11 when safety injection on Steam Line Pressure Low is manually blocked.
- (e) Time constants utilized in the rate/lag controller are t_1 and $t_2 \geq 50$ seconds.
- (f) Except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.
- (g) MODE 2 if Turbine Driven Main Feed Pumps are operating.
- (h) For the time period between February 23, 2000, and prior to turbine restart (following the next time the turbine is removed from service), the response time test requirement of SR 3.3.2.10 is not applicable for 1-FSV-47-027.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.2.10 (continued)

Therefore, staggered testing results in response time verification of these devices every 18 months. The 18 month Frequency is consistent with the typical refueling cycle and is based on unit operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

This SR is modified by a Note indicating that the SR should be deferred until suitable test conditions are established. This deferral is required because there may be insufficient steam pressure to perform the test.

There is an additional note pertaining to this SR on Page 3 of Table 3.3.2-1 of the Technical Specification, which states the following (Ref. 14):

Note h: For the time period between February 23, 2000, and prior to turbine restart (following the next time the turbine is removed from service), the response time test requirement of SR 3.3.2.10 is not applicable for 1-FSV-47-027.

SR 3.3.2.11

SR 3.3.2.11 is the performance of a TADOT as described in SR 3.3.2.8, except that it is performed for the P-4 Reactor Trip Interlock, and the Frequency is once per RTB cycle. This Frequency is based on operating experience demonstrating that undetected failure of the P-4 interlock sometimes occurs when the RTB is cycled.

The SR is modified by a Note that excludes verification of setpoints during the TADOT. The Function tested has no associated setpoint.

REFERENCES

1. Watts Bar FSAR, Section 6.0, "Engineered Safety Features."
2. Watts Bar FSAR, Section 7.0, "Instrumentation and Controls."
3. Watts Bar FSAR, Section 15.0, "Accident Analyses."

(continued)

BASES

REFERENCES
(continued)

4. Institute of Electrical and Electronic Engineers, IEEE-279-1971, "Criteria for Protection Systems for Nuclear Power Generating Stations," April 5, 1972.
5. Code of Federal Regulations, Title 10, Part 50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants."
6. WCAP-12096, Rev. 7, "Westinghouse Setpoint Methodology for Protection System, Watts Bar 1 and 2," March 1997.
7. WCAP-10271-P-A, Supplement 1 and Supplement 2, Rev. 1, "Evaluation of Surveillance Frequencies and Out of Service Times for the Reactor Protection Instrumentation System," and "Evaluation of Surveillance Frequencies and Out of Service Times for the Engineered Safety Features Actuation System." May 1986 and June 1990.
8. Watts Bar Technical Requirements Manual, Section 3.3.2, "Engineered Safety Feature Response Times."
9. TVA Letter to NRC, November 9, 1984, "Request for Exemption of Quarterly Slave Relay Testing, (L44 841109 808)."
10. Evaluation of the applicability of WCAP-10271-P-A, Supplement 1, and Supplement 2, Revision 1, to Watts Bar.
11. Westinghouse letter to TVA (WAT-D-8347), September 25, 1990, "Charging/Letdown Isolation Transients" (T33 911231 810).
12. Design Change Notice W-38238 associated documentation.
13. WCAP-13877, Rev. 1, "Reliability Assessment of Westinghouse Type AR Relays Used As SSPS Slave Relays," August 1998.
14. TVA's Letter to NRC dated February 25, 2000, "WBN Unit 1 Request for TS Amendment for TS 3.3.2 - ESFAS Instrumentation"



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 23 TO FACILITY OPERATING LICENSE NO. NPF-90

TENNESSEE VALLEY AUTHORITY

WATTS BAR NUCLEAR PLANT, UNIT 1

DOCKET NO. 50-390

1.0 INTRODUCTION

By letter dated February 25, 2000, the Tennessee Valley Authority (TVA, the licensee) submitted a request for changes to the Watts Bar Nuclear Plant, Unit 1 (WBN), Technical Specifications (TS). The requested changes would add a Note (h) to TS Table 3.3.2-1, "Engineered Safety Feature Actuation System Instrumentation" specifying that the response time test requirement of Surveillance Requirement (SR) 3.3.2.10 is not applicable for solenoid valve 1-FSV-47-027 until the next time the turbine is removed from service.

2.0 BACKGROUND

On February 22, 2000, TVA entered TS 3.0.3 following the discovery that, during the spring 1999 plant outage, a response time test required by TS SR 3.3.2.10 had not been conducted for a Train B turbine trip solenoid valve, 1-FSV-47-027. By letter dated February 24, 2000, TVA requested that the Nuclear Regulatory Commission (NRC) exercise discretion not to enforce compliance with the actions required in TS SR 3.3.2.10, which, in conjunction with TS Table 3.3.2-1 Function 5.b, Steam Generator Water Level High-High, requires that engineered safety feature actuation system response times be verified to be within limits on a 36-month frequency. The valve, 1-FSV-47-027, was scheduled to be tested in response to this requirement during the last Watts Bar outage in the spring of 1999. The licensee states that the valve was replaced as a preventive maintenance measure during the spring 1999 outage and that, although functional testing was performed, the response time testing of the valve was not completed. This meant that, at that time, the requirements of SR 3.3.2.10 and Limiting Condition for Operation 3.3.2 were not met. Since this would otherwise require the unit to be shut down to perform the testing, TVA requested that a Notice of Enforcement Discretion (NOED) be issued pursuant to the NRC's policy regarding exercise of discretion for an operating facility, set out in Section VII.c. of the "General Statement of Policy and Procedures for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600.

By letter dated February 25, 2000, the NRC staff documented its February 23, 2000, verbal approval of TVA's request. In its February 25, 2000 letter, the NRC staff stated that the enforcement discretion is for the period from 5:00 p.m. on February 23, 2000, until 5:00 p.m. on March 24, 2000, or until the TS revision requested by TVA letter dated February 25, 2000, is issued by the NRC. By letter dated February 25, 2000, TVA submitted the license amendment

ENCLOSURE

request for Watts Bar Unit 1. The proposed change to TS Table 3.3.2-1, Function 5.b requested relief from the specified response time testing for valve 1-FSV-47-027 until the next time the turbine is taken out of service.

3.0 EVALUATION

TVA's proposed change to TS Table 3.3.2-1 was made on the basis of the following safety analysis prepared by TVA and Westinghouse.

During Refueling Outage 2 the Train B solenoid-operated emergency trip dump valve was replaced with a like for like replacement. This replacement valve was then functionally verified on April 15, 1999. During work on a subsequent proposed design change, TVA engineers discovered on February 22, 2000, that the response time for this function had not been verified. Response time testing for other components in the Train B function is still in frequency. Required response time testing of the Train A turbine trip was performed satisfactorily in the last outage.

Technical Specification LCO 3.3.2 requires turbine trip and feedwater isolation for Steam Generator Water Level High-High, Safety Injection, and Valve Vault Room Level High. SR 3.3.2.10 is applicable to Steam Generator Water Level High-High. Technical Requirements Manual (TRM) technical requirement (TR) 3.3.2 specifies that Steam Generator Water Level High-High trip the turbine in ≤ 2.5 seconds and perform feedwater isolation in 8 seconds. TR 3.3.2 for Safety Injection and Valve Vault Room Level High does not specify a response time for turbine trip, but only for feedwater isolation.

Westinghouse performed a qualitative review of the WBN Feedwater Malfunction analysis, which models turbine trip and feedwater isolation off of the steam generator high-high water level setpoint, with a ≤ 2.5 second delay on the turbine trip. The event is analyzed primarily to demonstrate that the Departure from Nucleate Boiling (DNB) design basis is satisfied. The minimum DNB Ratio (DNBR) in the current analysis occurs prior to the time of turbine trip. In addition, the DNBR remains relatively constant up until the time of the turbine trip and is well above the safety analysis limit DNBR. Therefore, an increase in response time would not result in a more limiting condition for this analysis, but would only delay the time that the event is terminated. Even if the turbine trip does not occur, the feedwater isolation signal would cause the steam generator to drain down and the transient would simply behave as a loss-of-normal feedwater/inadvertent emergency core cooling system (ECCS) at power event. The resultant transient would be bounded by the existing Final Safety Analyses Report (FSAR) analyses. Westinghouse evaluation also indicates that delayed trip would slightly decrease DNBR, but would remain above the DNBR limit.

For Steam Generator Water Level High-High, turbine trip is primarily an equipment protection function, as described in the Technical Specification Bases. This function prevents possible damage to the turbine due to water in the steam lines. Therefore, from the preceding, WBN has concluded:

- Turbine trips have been functionally verified in accordance with technical specifications and the turbine protection program.
- The Train A response times have been verified per technical specifications.
- Other Train B turbine trip components remain within technical specification surveillance frequency for response time testing.
- Turbine trip response time is not a significant contributor in the accident analysis.
- Even if the turbine trip does not occur, the feedwater isolation signal would cause the steam generator to drain down and the transient would behave as a loss-of-normal feedwater/inadvertent ECCS at power event. The resultant transient would be bounded by the existing FSAR analyses.
- Because of the above, it is reasonable to assume that turbine trip will occur as described in the accident analysis and therefore, failure to obtain response time data for the train B solenoid does not pose an issue of safety significance.

Accordingly, the delay in performing the SR for valve 1-FSV-47-027 until the next time the turbine generator is removed from service does not represent a threat to plant safety.

On the basis of the staff's evaluation of the licensee's analysis, as discussed above, including showing that the consequences of a failure of the subject solenoid valve would be bounded by existing FSAR analyses, the staff finds the results of the analysis to be acceptable. Accordingly, the staff finds the proposed TS change granting relief from the specified surveillance test for solenoid valve 1-FSV-47-027 until the next time the turbine is removed from service acceptable.

4.0 STATEMENT OF EXIGENT CIRCUMSTANCES

The Commission's regulation, as stated in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.91, provides special exceptions for the issuance of an amendment when the usual 30-day public notice cannot be met. One type of special exception is an exigency. An exigency exists when the staff and the licensee need to act quickly and time does not permit the staff to publish a *Federal Register* notice allowing 30 days for prior public comment, and the staff also determines that the amendment involves no significant hazards consideration.

The licensee submitted the request for amendment on February 25, 2000. In accordance with 10 CFR 50.91(a)(6)(i)(A), the staff published a notice in the *Federal Register* to provide reasonable notice to the public of the proposed amendment and proposed finding of no significant hazards consideration, and reasonable opportunity to comment thereon. The notice was published in the *Federal Register* on March 2, 2000, and requested any comments be submitted within 14 days after the date of publication. No comments were received.

TS SR 3.3.2.10, in conjunction with TS Table 3.3.2-1 Function 5.b, Steam Generator Water Level High-High, requires that engineered safety feature actuation system response times be verified to be within limits on a 36-month frequency. The Train B turbine trip solenoid valve, 1-FSV-47-027, was scheduled to be tested in response to this requirement during the last Watts Bar outage in the spring of 1999. The licensee states that the valve was replaced as a preventive maintenance measure during the spring 1999 outage and that, although functional testing was performed, the response time testing of the valve was not completed. This meant that, at that time, the requirements of SR 3.3.2.10 and Limiting Condition for Operation 3.3.2 were not met.

Following discovery of these circumstances, on February 22, 2000, at 1700 hours, with the unit at full power, TS SR 3.0.3 was entered. TS SR 3.0.3 would require a complete performance of the response time test within 24 hours or declaration of Function 5.b inoperable and entry into the appropriate TS Condition. The response time test cannot be performed at power since it would require initiation of a turbine trip; therefore, to meet the TS the unit would have to be shut down. As a result, a NOED was requested and issued for Watts Bar Unit 1, and the licensee requested that the related amendment be issued on an exigent basis.

This amendment completes the review process and implements the proposed TS change for Watts Bar Unit 1, pursuant to the NRC's policy regarding the execution of enforcement discretion for an operating facility set out in Section VII.c of the "General Statement of Policy and Procedures for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600, for processing NOEDs. The staff has determined that, because compliance with the TS response time test requirements would necessitate a plant shutdown, and in accordance with the NRC staff's usual practice of issuing the license amendment within 4 weeks of the NOED, issuance of this amendment is needed in less than the usual 30-day comment period allowed for processing an amendment to the TS. The licensee promptly submitted its application letter upon discovery of the missed surveillance test. Therefore, pursuant to 10 CFR 50.91(a)(6), the staff has determined that exigent circumstances exist and the amendment is being processed accordingly.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

In accordance with the criteria set forth in 10 CFR 50.91 and 50.92, the licensee has evaluated this proposed TS change and determined it does not represent a significant hazards consideration. The following is provided by the licensee in support of this conclusion.

- (A) Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The requested amendment will not result in a significant increase in the consequences of an accident as the turbine trips have been functionally verified in accordance with the technical specifications and the turbine protection program and turbine trip response time is not a significant contributor to the accident analysis. Accordingly, there would be no impact on projected offsite doses.

- (B) 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.

As discussed above, the safety function of the solenoid valve was confirmed during the post maintenance testing. Further, during the functional testing the control room operator observed normal operation of the trip function. Although the response time was not quantitatively determined for the end device, this deficiency cannot create a new or different accident from any previously evaluated.

- (C) Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

Again as discussed above, the trip function was confirmed by post maintenance testing, and the operator did not observe any abnormal delay in response. This clearly indicates there would be no significant reduction in a margin of safety associated with the lack of quantitative documentation of the response time for a portion of the Steam Generator Water Level High High turbine trip function.

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 determines that the amendment request involves no significant hazards consideration.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Tennessee State official was notified of the proposed issuance of the amendment. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes a surveillance requirement. The U.S. Nuclear Regulatory Commission staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final finding that the amendment involves no significant hazards consideration. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

8.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by

operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Robert E. Martin, NRR

Date: **March 22, 2000**

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Tennessee Valley Authority

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