



DOCKETED  
USNRC

'00 MAY -2 AIG:13

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

OFFICE OF THE  
GENERAL COUNSEL  
ADJUDICATIONS STAFF

April 25, 2000

DOCKET NUMBER  
PETITION RULE PRM 50-69  
(65FR6044)

Ms. Annette Vietti-Cook  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
ATTN: Rulemakings and Adjudications Staff  
Washington, D.C. 20555-0001

Dear Ms. Vietti-Cook:

NUCLEAR REGULATORY COMMISSION (NRC) - PETITION FOR RULEMAKING;  
WESTINGHOUSE ELECTRIC COMPANY LLC; (Volume 65, No. 26, *Federal Register* 6044)

The Tennessee Valley Authority (TVA) appreciates the opportunity to review and comment on the subject petition for rulemaking published in the February 8, 2000 *Federal Register*. TVA has participated in an industry effort with the Nuclear Energy Institute (NEI) to collect and transmit comments. Based on our participation and review of this collective effort, TVA endorses the comments transmitted by NEI's letter to the NRC dated April 24, 2000, "Industry Comments on Petition for Rulemaking by Westinghouse Electric Company LLC, on 10 CFR 50, Appendix G, fracture Toughness Requirements (Fed. Reg. 6044)."

The technical bases for elimination of the flange requirement is adequately addressed in WCAP-15315 as well as the safety implications. TVA will improve operational flexibility and safety as a result of using ASME Code Case N-640 for establishment of pressure-temperature limit curves. Accordingly, TVA supports the requested change to Table 1 of 10 CFR 50, Appendix G, for the elimination of requirements related to the metal temperature of the closure head flange and vessel flange regions of the reactor pressure vessel proposed by this petition.

Mr. Secretary  
Page 2  
April 25, 2000

If you have any questions, please contact Terry Knuettel at (423)  
751-6673.

Sincerely,

*Ralph H. Shell*

*for*  
Mark J. Burzynski  
Manager  
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001