



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

June 13, 2005

4/12/05
70 FR 19125
(7)

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2005 JUN 17 PM 2:40

RULES AND DIRECTIVES
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USNRC

Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - COMMENTS ON THE PROPOSED GENERIC COMMUNICATION; GRID RELIABILITY AND THE IMPACT ON PLANT RISK AND OPERABILITY OF OFFSITE POWER (70 FEDERAL REGISTER 19125)

TVA appreciates the opportunity to provide comments on the subject generic communication and endorses the industry comments provided by the Nuclear Energy Institute (NEI) on June 7, 2005.

TVA shares NEI's position that the Institute of Nuclear Power Operations (INPO) Significant Operating Experience Report (SOER) 99-01 Addendum adequately addresses the issues associated with the deregulation of the power industry, and most of the concerns raised in the Nuclear Regulatory Commission's (NRC) draft Generic Letter (GL). INPO evaluation and assessment of utility implementation of SOER recommendations will ensure that nuclear utilities are addressing the issues. The nuclear industry has also been working with the North American Electric Reliability Council (NERC) and regional transmission organizations to develop and issue NERC standards that will address the need for formal agreements and communications protocols regarding the special operating requirements of nuclear generating stations. TVA is participating in grid reliability workshops sponsored by NEI, Electric Power Research Institute (EPRI), INPO, and NERC. We believe that these forums are the correct approach to address grid reliability issues and that the proposed GL is unnecessary given the upcoming issuance of these new standards and the implementation of grid reliability programs.

TVA is also concerned with the NRC's emphasis in the draft GL concerning the use of a real-time contingency analysis (RTCA) program to determine the adequacy of offsite power at the nuclear generating station, and there is a concern for maintenance risk assessments consideration. The use of a RTCA program is not necessarily the best or only viable method to assure adequate post-trip voltage levels. RTCA programs use an unproven technology that is in the early stages of development and implementation by various transmission organizations.

SIS Review Complete

E-RIDS = ADM-03

Call = A. MARKLEY (AWM)

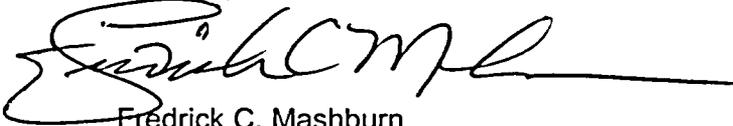
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We agree with NEI's objection to the implication that a seasonal period of increased offsite power risk should be defined based on historical grid conditions, and that such a parameter should influence the scheduling of sensitive maintenance activities. Historical data is too sparse to support such an action. Periods of increased system stress and offsite power risk may have had some seasonal correlation in the past when the power system was operated in a coordinated and cohesive manner by integrated utilities. However, this is no longer the case. Under deregulation the generation schedules are independently determined and transfer patterns no longer follow predictable seasonal trends. Offsite power adequacy and risk factors are continually evaluated by the Transmission Supply Operator (TSO) through the assessments of actual and expected grid conditions, and the nuclear generating stations are informed of periods of increased risk. Perceived regulatory pressure to identify and avoid certain time windows, based on historical experience, could cause important maintenance activities to be rescheduled or delayed unnecessarily.

Once again, TVA appreciates the opportunity to comment on this proposed GL. If you have any questions, please contact Rob Brown at (423) 751-7228.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fredrick C. Mashburn', with a long horizontal flourish extending to the right.

Fredrick C. Mashburn
Senior Program Manager
Nuclear Licensing

RMB:BKA
cc: U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-001



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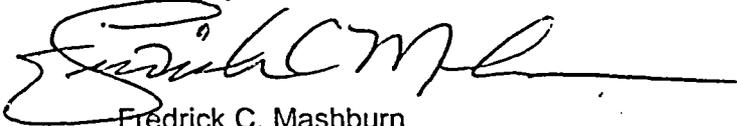
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