

EDO Principal Correspondence Control

FROM: DUE: / /

EDO CONTROL: G20070361
DOC DT: 05/17/07
FINAL REPLY:

David A. Lochbaum
Union of Concerned Scientists

TO:

Doc. Control Desk

FOR SIGNATURE OF :

** GRN **

CRC NO:

DESC:

Watts Bar Nuclear Plant - Unit 2 - Another Key
Assumption for the Possible Completion of
Construction Activities

ROUTING:

Reyes
Virgilio
Kane
Ash
Silber
Ordaz
Cyr/Burns
Travers, RII

DATE: 05/18/07

ASSIGNED TO:

CONTACT:

NRR

Dyer

SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action.

Template: EDO-001

E-RIDS: EDO-01



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

May 17, 2007

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop: OWFN P1-35
Washington, DC 20555-0001

In the Matter of)
Tennessee Valley Authority)

Docket No. 50-391

SUBJECT: WATTS BAR NUCLEAR PLANT (WBN) – UNIT 2 – ANOTHER KEY ASSUMPTION FOR THE POSSIBLE COMPLETION OF CONSTRUCTION ACTIVITIES

Reference: TVA letter dated April 3, 2007, Preston D. Swafford, Interim Chief Nuclear Officer, to NRC, "Watts Bar Nuclear Plant (WBN) – Unit 2 – Key Assumptions for the Possible Completion of Construction Activities."

Dear Mr. or Ms. Desk:

The Tennessee Valley Authority (TVA) sent you the referenced letter seeking feedback from the Nuclear Regulatory Commission (NRC) on two licensing assumptions in its decision-making process about Watts Bar Unit 2. In reviewing that letter, one equally key assumption appears missing.

As TVA mentions, the NRC licensed Watts Bar Unit 1 in 1996. It is more than a decade later and TVA may seek a license from NRC for Watts Barr Unit 2. The missing key assumption involves that significant time gap, the decade-plus between the licensing of Unit 1 and the potential licensing of Unit 2.

If licensed, Watts Bar Unit 2 would share common equipment with Watts Bar Unit 1. For example, both units would rely on common offsite and onsite power systems, essential service water systems component cooling water system, and common area ventilation systems. Since being licensed by the NRC in 1996, Watts Bar Unit 1 has operated and used up a considerable chunk of the useful life of the common equipment and systems.

Because Watts Bar Unit 1 is more than ten years older than her Unit 2 "twin sister," it seems necessary to identify a licensing assumption relative to this common equipment. In other words, would the license term for Watts Bar Unit 2 be 40 years minus the time accrued on the common equipment and systems that Unit 1 has used up, a full 40 years based on some license renewal styled aging management review for the common equipment and systems, or some other duration? The term of the license and its associated conditions seem very relevant to the scope of homework necessary for Watts Bar Unit 2.

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EDO --G20070361

May 17, 2007
Page 2 of 2

In their letter, TVA sought NRC's feedback on their key licensing assumptions. If you concur with our view on the shared systems issue, please include it in the feedback you provide TVA.

Sincerely,

A handwritten signature in black ink, reading "David Lochbaum". The signature is written in a cursive, flowing style with a large initial 'D'.

David Lochbaum
Director, Nuclear Safety Project