



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

July 23, 2007

6/23/07
72 FR 29010

(3)

U.S. Nuclear Regulatory Commission
MS T6-D59
11545 Rockville Pike
Rockville, Maryland 20852-2738

ATTN: Chief, Rulemaking, Directives and Editing Branch

Gentlemen:

TENNESSEE VALLEY AUTHORITY (TVA) - Comments ON Proposed Generic
Communication CONCERNING Managing gas intrusion (Vol. 72 FR 29010-29015)

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RULES AND DIRECTIVES
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USNRC

TVA appreciates the opportunity to review and provide comments to the subject generic letter. The generic letter addresses the issue of gas intrusion into the emergency core cooling, decay heat removal, and containment spray systems.

TVA offers the following comment:

TVA believes that casting the 40 events at Sequoyah mentioned in the subject Federal Register Notice as "waterhammer events" is misleading. In common nuclear industry use, the term waterhammer has the connotation of a large pressure transient that causes significant dynamic loads in the associated piping, subsequent pipe movement, and (in many cases) damage to the piping supports and the piping itself. The subject events at Sequoyah varied widely in magnitude and did not involve violent pipe movement. As mentioned in the draft, the events did not result in Residual Heat Removal (RHR) system inoperability. Rather, most of these events occurred when the Sequoyah RHR system was isolated. In this condition, "out gas" pockets formed within system high points and caused less significant gas bubble compressions. If the generic letter continues to reference the 40 Sequoyah events, the description of these events should be modified to provide a proper context.

If you have questions regarding our comments, please contact Rob Brown at (423) 751-7228.

Sincerely,

Beth A. Wetzel

Beth A. Wetzel
Manager, Corporate Licensing
and Industry Affairs

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RMB:RPS

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